CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

NEGATIVE DECLARATION

9500 Pico Mixed-Use Project

Case Number: ENV-2020-5838-ND
CPC-2020-5837-DB-CU-SPR-VHCA

Project Location: 9500 - 9530 W. Pico Boulevard, Los Angeles, CA 90035

Community Plan Area: West Los Angeles

Council District: 5 – Paul Koretz

Project Description: TRG 9500 W Pico LLC (the "Applicant") proposes the demolition of a car wash, food stand, and office building for the construction, use, and maintenance of a six-story mixed-use building with a total of 108 residential dwelling units and a total of 3,250 square feet of commercial space (1,000 square-foot restaurant and 2,250 square feet of retail). The Project Site consists of ten parcels in the City of Los Angeles, on the south side of Pico Boulevard, between Beverly Drive and Reeves Street. The Proposed Project's total floor area would consist of 96,871 square feet resulting in a floor area ratio of 3.75:1. Up to 12,600 square feet of open space would be provided, consisting of common open space and private balconies. A total of 134 parking spaces would be provided within two levels of subterranean parking. Additionally, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 12.22 A.25, a Density Bonus Compliance Review to permit a mixed-use housing development with 108 units and 3,250 square feet of commercial space, and with the following four Off-Menu Density Bonus Incentives/Waivers: (a) an increase in FAR from 1.5:1 to a maximum of 3.75:1, (b) an increase in height from 45 feet and 3 stories to 72 feet and 6 stories, (c) to provide 52 percent of the residential parking stalls as compact stalls, and (d) to waive the required commercial loading space; (2) Pursuant to LAMC Section 12.24 U.26, a Conditional Use Permit to allow a 50 percent density increase, in exchange for reserving 17 percent of the base density as very low income units (13 units); and (3) Pursuant to LAMC Section 16.50, Site Plan Review for a proposed residential building creating more than 50 net dwelling units. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, foundation, haul route (for the export of approximately 21,040 cubic yards of soil), and building construction for the Project Site. There are no native trees on the Project Site that are protected by the LAMC Protected Tree Ordinance (Ord. No. 177404); however the Project proposes the removal and replacement of 3 street trees within the public right-of-way subject to the approval of the Urban Forestry Division of the Department of Public Works.

PREPARED FOR:	**PREPARED BY:**	**APPLICANT:**
The City of Los Angeles Department of City Planning	Parker Environmental Consultants, LLC	TRG 9500 W Pico LLC

July 2021

INITIAL STUDY CHECKLIST
NEGATIVE DECLARATION

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[1] *The Department of City Planning case number was revised from ENV-2019-4574 to ENV-2020-5838. Because some of the technical reports and agency response letters were prepared prior to the updated case number, the prior case number may appear on these reports. However, all of these reports are associated with the Project.*

APPENDIX D: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX E: ENVIRONMENTAL SITE ASSESSMENT

E. 1 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, Century West Car Wash, 9500 West Pico Boulevard, Los Angeles, CA 90035, January 18, 2017.

E.2 Apex Companies, LLC, Path to Closure Narrative, Century West Car Wash, 9500 W. Pico Boulevard, Los Angeles, CA 90035, LARWQCB#900640107, March 25, 2021.

APPENDIX F: NOISE MONITORING DATA AND CALCULATIONS WORKSHEETS

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G.2: City of Los Angeles, Department of Transportation, Inter-Departmental Correspondence to the Department of City Planning, Trip Generation Assessment for the Proposed Mixed-Use Project Located at 9500 West Pico Boulevard (Revised 3rd version), DOT Case No. WLA19-108250, November 30, 2020.

APPENDIX H: CULTURAL RECORDS SEARCH

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H.2: Natural History Museum, Paleontological Resources for the Proposed 9500 Pico Mixed-Use Project, Project # ENV-2019-4574-EAF, in the City of Los Angeles, Los Angeles County, Project Area, September 19, 2019.

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APPENDIX J: TREE REPORT

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APPENDIX K: UTILITIES AND SERVICE RESPONSE LETTERS

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K.3: Los Angeles Police Department, The 9500 Pico Mixed-Use Project [ENV-2019-4574-EAF], March 20, 2020.

K.4: Los Angeles Unified School District, Facilities Services Division, 9500-9530 Pico Mixed-Use Project, 9500 West Pico Boulevard, Los Angeles, CA 90035, April 10, 2020.

K.5: Los Angeles Public Library, 9500 Pico Boulevard Mixed Use Project, Request for Information, Los Angeles Public Library Response, April 8, 2020.

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INITIAL STUDY/ NEGATIVE DECLARATION (IS/ND)

Section 1. Introduction

Project Information

Project Title: 9500 Pico Mixed-Used Project
Project Location: 9500 – 9530 W Pico Boulevard, Los Angeles, CA 90035

Project Applicant: TRG 9500 W Pico LLC
11150 W. Olympic Boulevard, Suite 975
Los Angeles, CA 90064

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

An application for the proposed 9500 Pico Mixed-Use Project ("Proposed Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Proposed Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/ Negative Declaration (IS/ND) analyzes potential environmental effects resulting from construction, implementation, and operation of the Proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this IS/ND, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 Purpose of an Initial Study

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or

mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

1.2. Organization of the Initial Study

This Initial Study is organized into six sections as follows:

Section 1. Introduction: This Section provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.

Section 2. Executive Summary: This Section provides the Proposed Project information, identifies key areas of environmental concern, and includes a determination whether the Proposed Project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Proposed Project, including project characteristics, related project information and a list of requested discretionary actions.

Section 4. Evaluation of Environmental Impacts: This Section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Proposed Project.

Section 5. Preparers and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

Section 6. References, Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

1.3. CEQA Process

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Proposed Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Proposed Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared an Initial Study to identify the preliminary environmental impacts of the Proposed Project. The Initial Study for the Proposed Project determined that the Proposed Project would not have significant environmental impacts.

If this IS/ND and the Proposed Project are approved by the City, then within five days of the action, the City will file a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

Section 2. Executive Summary

Project Title:	9500 Pico Mixed-Use Project
Environmental Case Number:	ENV-2020-5838-ND
Related Cases:	CPC-CPC-2020-5837-DB-CU-SPR-VHCA
Project Location:	9500-9530 W. Pico Boulevard Los Angeles, CA 90035
Community Plan Area:	West Los Angeles
Council District:	5 – Paul Koretz
Lead City Agency:	City of Los Angeles Department of City Planning
Staff Contact Name and Address:	More Song 200 N. Main Street, Room 763 Los Angeles CA 90012
Phone Number:	(213) 978-1319
Applicant Name and Address:	TRG 9500 W. Pico, LLC 11150 W. Olympic Boulevard, Suite 975 Los Angeles, CA 90064
Phone Number:	(310) 551-0660
General Plan Designation:	Neighborhood Commercial
Zoning:	C4-1VL-O

PROJECT DESCRIPTION:

TRG 9500 W Pico LLC (the "Applicant") proposes the demolition of a car wash, food stand, and office building for the construction, use, and maintenance of a six-story mixed-use building with a total of 108 residential dwelling units and a total of 3,250 square feet of commercial space (1,000 square-foot restaurant and 2,250 square feet of retail). The Project Site consists of ten parcels in the City of Los Angeles, on the south side of Pico Boulevard, between Beverly Drive and Reeves Street. The Proposed Project's total floor area would consist of 96,871 square feet resulting in a floor area ratio of 3.75:1. Up to 12,600 square feet of open space would be provided, consisting of common open space and private balconies. A total of 134 parking spaces would be provided within two levels of subterranean parking. Additionally, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 12.22 A.25, a Density Bonus Compliance Review to permit a mixed-use housing development with 108 units and 3,250 square feet of commercial space, and with the following four Off-Menu Density Bonus Incentives/Waivers: (a) an increase in FAR from 1.5:1 to a maximum of 3.75:1, (b) an increase in height from 45 feet and 3 stories to 72 feet and 6 stories, (c) to provide 52 percent of the residential parking stalls as compact stalls, and (d) to waive the required commercial loading space; (2) Pursuant to LAMC Section 12.24 U.26, a Conditional Use Permit to allow a 50 percent density increase, in exchange for reserving 17 percent of the base density as very low income units (13 units); and (3) Pursuant to LAMC Section 16.50, Site Plan Review for a proposed residential building creating more than 50 net dwelling units. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, foundation, haul route (for the export of approximately 21,040 cubic yards of soil), and building construction for the Project Site. There are no native trees on the Project Site that are protected by the LAMC Protected Tree Ordinance (Ord. No. 177404); however the Project proposes the removal and replacement of 3 street trees within the public right-of-way subject to the approval of the Urban Forestry Division of the Department of Public Works.

ENVIRONMENTAL SETTING:

The Project Site includes ten parcels with the following Assessor Parcel Numbers (APN No. 4306-002-013 and 4306-002-023) and encompasses approximately 25,823 square feet of gross lot area (0.59 acres). The Project Site is currently occupied by a car wash, food stand, and office building. The properties surrounding the Project Site include a mix of commercial uses (including restaurants and retail), multi-family residential, hotels, and office uses.

(For additional detail, see “Section 3. Project Description”).

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

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

YES. Consultation was requested by the Gabrieleno Band of Mission Indians – Kizh Nation on February 4, 2021; however, on March 23, 2021, this tribe stated that upon closer evaluation of the project, it was determined that no further discussion was necessary, and that the tribe would not seek further consultation regarding the Proposed Project. No other tribes requested consultation.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.). Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Heather Bleemers	Senior City Planner
PRINTED NAME	**TITLE**
	July 2, 2021
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

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

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

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

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

INITIAL STUDY/ NEGATIVE DECLARATION

Section 3. Project Description

A. Project Summary

TRG 9500 W Pico LLC (the "Applicant") proposes the demolition of a car wash, food stand, and office building for the construction, use, and maintenance of a six-story mixed-use building with a total of 108 residential dwelling units and a total of 3,250 square feet of commercial space (1,000 square-foot restaurant and 2,250 square feet of retail). The Project Site consists of ten parcels in the City of Los Angeles, on the south side of Pico Boulevard, between Beverly Drive and Reeves Street. The Proposed Project's total floor area would consist of 96,871 square feet resulting in a floor area ratio of 3.75:1. Up to 12,600 square feet of open space would be provided, consisting of common open space and private balconies. A total of 134 parking spaces would be provided within two levels of subterranean parking. Additionally, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces.

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B. Environmental Setting

1. Project Location

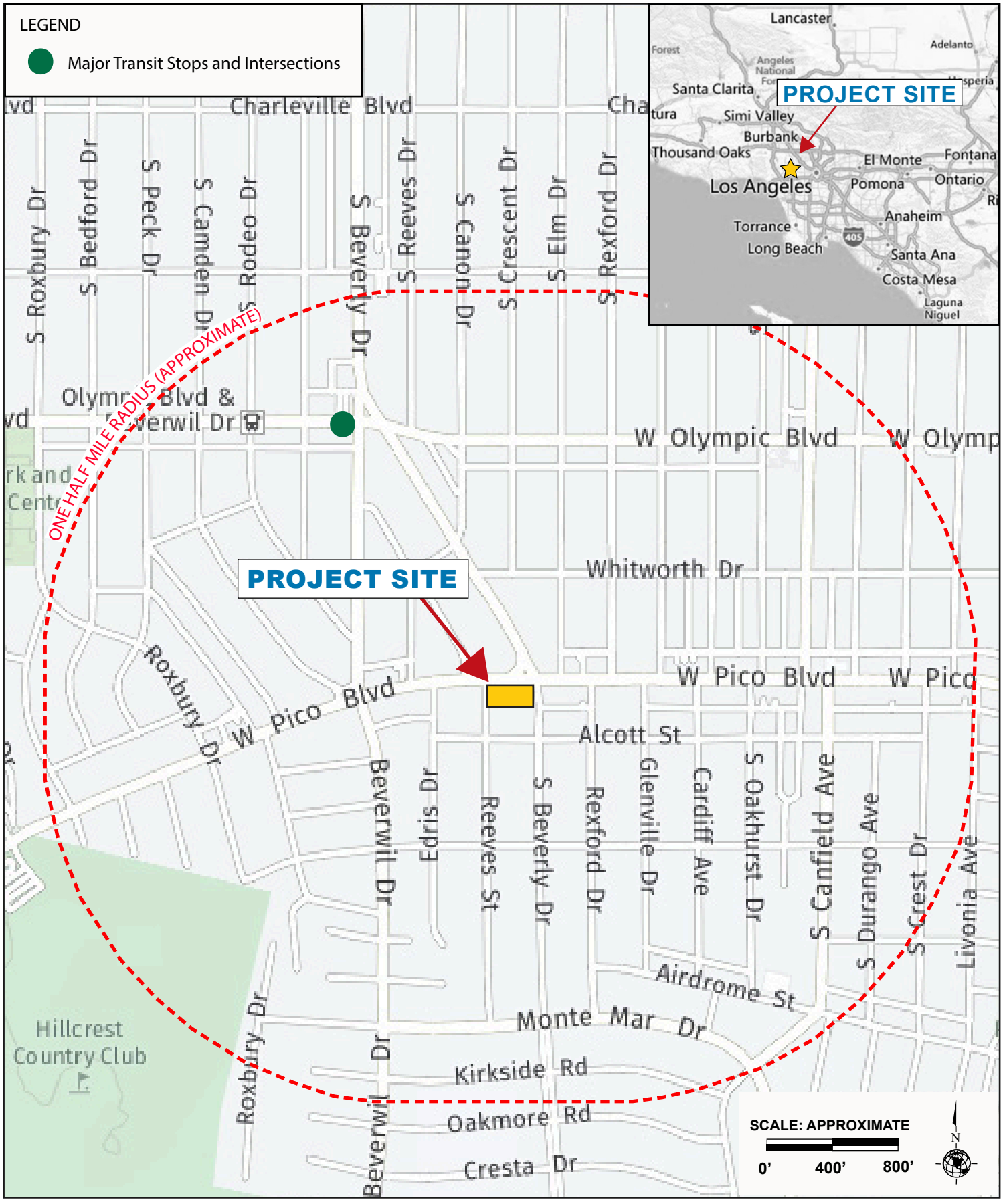
The Project Site is located in the West Los Angeles Community Plan area within the City of Los Angeles. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses ten parcels and comprises approximately 25,823 square feet of gross lot area (0.59 acres). The Project Site's property addresses, Assessor's Parcel Numbers (APN), land use and lot area are summarized in Table 3.1, Summary of the Project Site, below.

Table 3.1
Summary of Project Site

Address	APN	Existing Land Use	Lot Area (square feet)
9500 W. Pico Boulevard	4306-002-023	Car Wash with food stand	25,823
9516 W. Pico Boulevard	4306-002-013		
9524 W. Pico Boulevard 9526 W. Pico Boulevard 9528 W. Pico Boulevard 9530 W. Pico Boulevard	4306-002-013	One-story office building	
Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed August 2019.			

The Project Site is generally bound by Pico Boulevard to the north; Reeves Street to the west; Beverly Drive to the east; and an alleyway and multi-family buildings to the south.

Primary vehicular access to the Project Site is provided by the San Diego Freeway (I-405) approximately 2.8 mile to the west and the Santa Monica Freeway (I-10). Local street access is provided by the grid roadway system surrounding the Project Site. Pico Boulevard, which borders the Project Site to the north, is a two-way street providing two travel lanes in each direction. Pico Boulevard is classified as an Avenue I roadway in the City's Mobility Plan. S. Beverly Drive, which borders the Project Site to the east, is a two-way street providing one travel lane in each direction. Beverly Drive, south of Pico Boulevard and adjacent to the Project Site is designated as a Local Street in the City's Mobility Plan. North of Pico Boulevard, Beverly Drive is a designated as an Avenue I roadway. Reeves Street, which borders the Project Site to the west, is a two-way street providing one travel lane in each direction. Reeves Street is designated as a Local Street in the City's Mobility Plan. Street parking is provided along Pico Boulevard, Beverly Drive, and Reeves Street with restrictions. Other major arterial roadways providing access to the Project Site is Santa Monica Boulevard, which is located approximately



Source: Yahoo Maps, 2019.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 3.1
Project Location Map

1.1 miles northwest of the Project Site and Wilshire Boulevard, which is located approximately 0.8 miles north of the Project Site. Santa Monica Boulevard and Wilshire Boulevard are designated as Avenue I roadways in the City's Mobility Plan.

The Los Angeles Metropolitan Transportation Authority (Metro) and Santa Monica Big Blue Bus (BBB) operate multiple bus lines with multiple bus stops within walking distance from the Project Site. In the vicinity of the Project Site, bus stops are primarily located along Pico Boulevard and Beverly Drive. Bus lines that operate in the Project Site area include, but are not limited to, Metro lines: 14; and Santa Monica Blue BBB line 7 and Rapid Line 7. The Project Site is also situated within easy walking distance to retail, restaurants, entertainment, and other commercial businesses located in the immediate area.

2. Existing Conditions

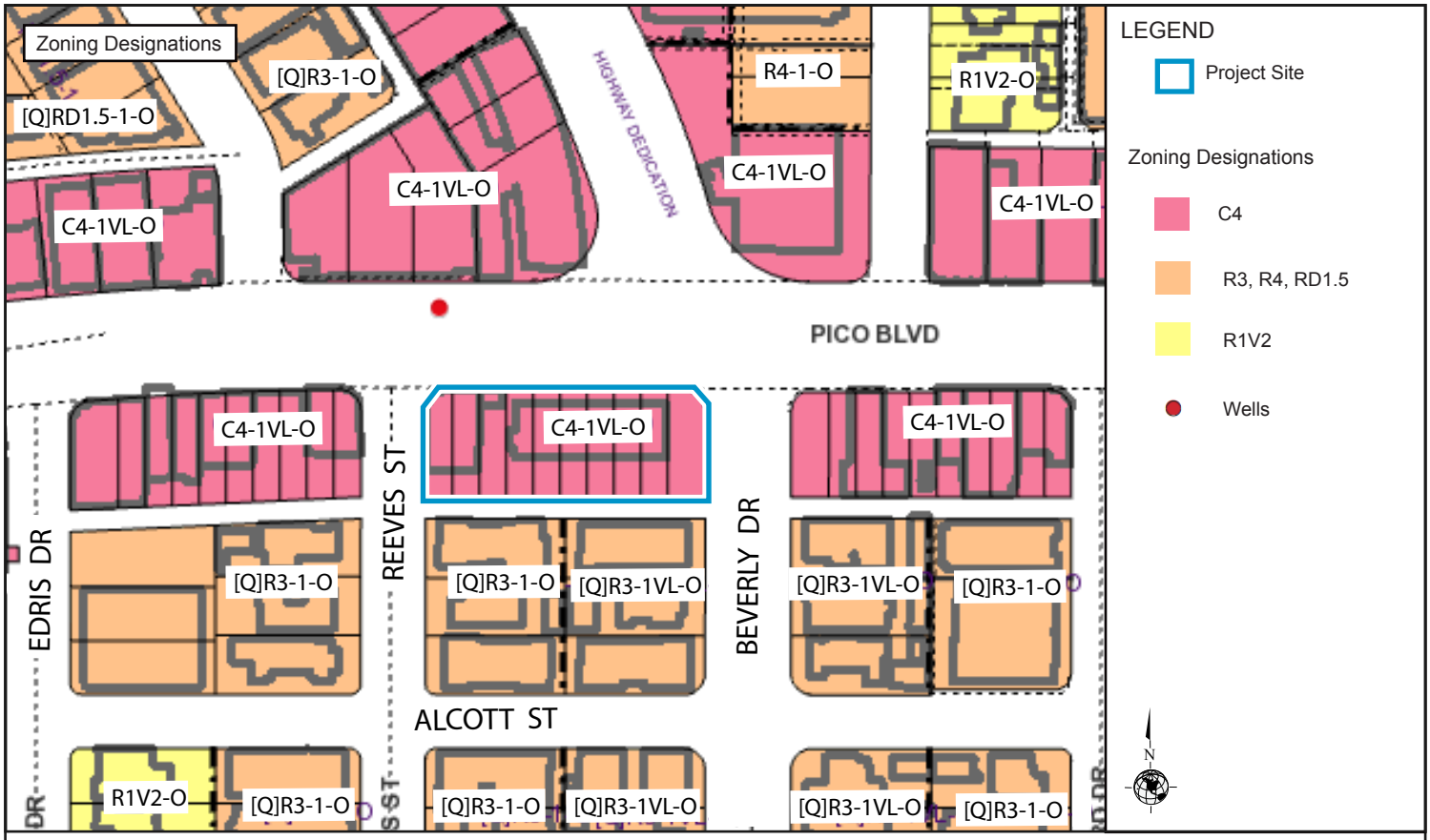
2.1 Zoning and Land Use Designations

Figure 3.2, Zoning and General Plan Designations Figure 3.2, Zoning and General Plan Designations, shows the existing and proposed zonings and land use designations on the Project Site and in the surrounding area. The zoning designations for the Project Site are zoned C4-1VL-O (Commercial Zone) with a General Plan land use designation of Neighborhood Commercial. The zones corresponding to the Neighborhood Commercial designation includes the C1, C1.5, C2, C4, RAS3, RAS4, and P zones. The Project Site is located in Height District No. 1VL. Height District No. 1VL establishes a height restriction of 45 feet above grade, three stories, and a FAR limitation of 3:1 for a C4 zone.

2.1.1 West Los Angeles Community Plan

The Project Site is located within the West Los Angeles Community Plan ("Community Plan") area of the City of Los Angeles. The Community Plan sets forth goals and objectives to maintain the community's distinctive character by: preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible housing opportunities; improving the function, design and economic vitality of commercial and industrial areas; preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance; maximizing development opportunities around future transit systems while minimizing any adverse impacts; and preserving and strengthening commercial and industrial developments to provide a diverse job-producing economic base; and through design guidelines and physical improvements, enhance the appearance of these areas.[2]

[2] *City of Los Angeles Department of City Planning, West Los Angeles Community Plan, July 27, 1999 (pg. II-2).*



Source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 3.2
Zoning and General Plan Land Use Designations

2.2 Existing Site Conditions

Figure 3.3, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.4, Photographs of the Project Site.

The Project Site is currently occupied by a car wash with an associated food stand and a one-story office building. There are four vehicle driveways that provide access to the Project Site: two driveways along Pico Boulevard and two driveways along Beverly Drive that provide access to the car wash. The adjacent alleyway to the south provides access to the rear parking of the office building. The Project Site contains one tree fronting the alleyway on the car wash property. There are three street trees on the public right-of-way adjacent to the Project Site: two trees along Pico Boulevard and one tree along Beverly Drive. The Proposed Project proposes to remove the on-site tree and three street trees; any replacement and new planting of street trees will be to the satisfaction of the Bureau of Street Services, Urban Forestry Division.

3. Surrounding Land Uses

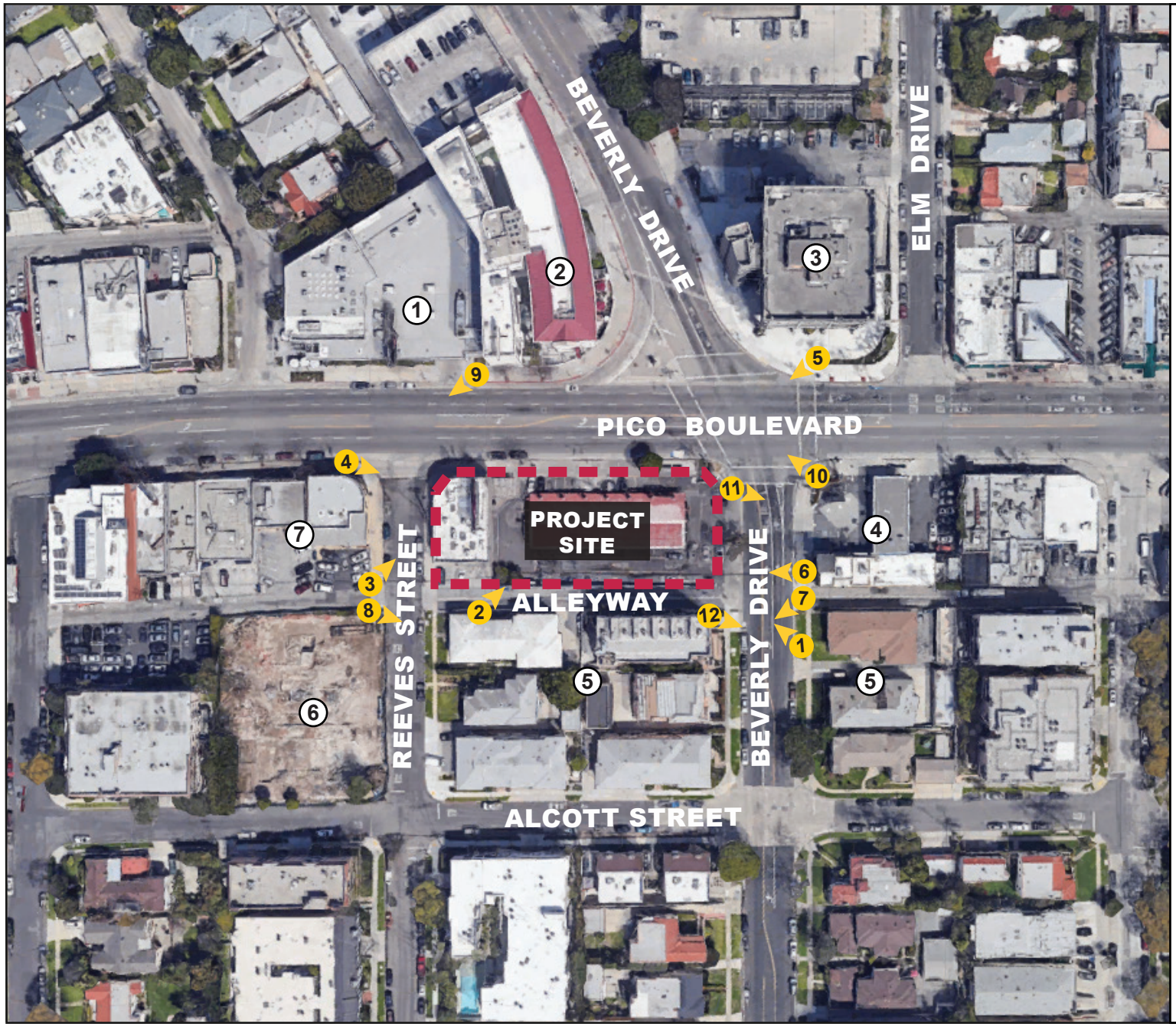
As shown in Figure 3.2, the Project Site is in a commercially zoned "C4-1VL-O" area, and properties immediately bordering the Project Site are zoned [Q]R3-1-O or [Q]R3-1VL-O with a General Plan land use designation of Medium Residential or C4-1VL-O zone with a General Plan land use designation of Neighborhood Commercial. The properties surrounding the Project Site include a mix of commercial uses (including restaurants and retail), multi-family residential, hotel, and office uses. These land uses range in height from one- to eight-stories above grade. Figure 3.3 shows an aerial photograph and list of the uses surrounding the Project Site. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5. Below is description of the existing conditions in the surrounding area.

North: Pico Boulevard immediately borders the Project Site to the north. North of Pico Boulevard is an eight-story hotel, a one-story retail building, and a six-story office building. The properties to the north are zoned C4-1VL-O with General Plan land use designations of Neighborhood Commercial. Refer to Figure 3.5, View 10.

West: Reeves Street immediately borders the Project Site to the west. To the west of Reeves Street are one- to two-story commercial and retail buildings. These properties are zoned C4-1VL-O with General Plan land use designations of Neighborhood Commercial. Refer to Figure 3.5, View 9.

East: Beverly Drive immediately borders the Project Site to the east. To the east of Beverly Drive is a gas station and associated market. This property is zoned C4-1VL-O with General Plan land use designations of Neighborhood Commercial. Two-story multi-family buildings are located to the south of the gas station property. These properties are zoned [Q]R3-1VL-O with General Plan land use designations of Medium Residential. Refer to Figure 3.5, Views 11 and 12.

South: An alleyway borders the Project Site to the south. To the south of the alleyway are two- to four-story multi-family residential buildings. These properties are zoned [Q]R3-1VL-O



LEGEND

Project Site Boundary

Photograph Locations

Surrounding Land Uses:

1: Office Depot (9527 W. Pico Blvd)

2: Commercial building (1115 N. Gower Street)

3: Commercial/Retail buildings (6101-6129 Santa Monica Blvd.)

4: Multi-family Residential

5: Multi-family Residential

6: Assisted Living

7: Multi-family Residential

8: Multi-family Residential

SCALE: APPROXIMATE

0 80' 160'

N

Source: Google Earth, Aerial View, 2019.

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Figure 3.3
Aerial Photograph of the Project Site and Surrounding Land Uses

View 1: On the eastern side of Beverly Drive, looking northwest at the Project Site.

View 2: Inside the alley between Alcott Street and Pico Boulevard, looking northeast at the Project Site.

View 3: On the western side of Reeves Street, looking northeast at the Project Site.

View 4: On the southern side of Pico Boulevard, looking east at the Project Site.

View 5: On the northern side of Pico Boulevard, between Beverly Drive and Elm Drive, looking southwest at the Project Site.

View 6: On the eastern side of Beverly Drive, looking west at the Project Site and the alleyway.

Source: Parker Environmental Consultants, 2020.

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Figure 3.4
Photographs of the Project Site
Views 1-6

View 7: On the eastern side of Beverly Drive, looking southwest at properties south of the Project Site.

View 8: On the western side of Reeves Street, looking southeast at properties south of the Project Site.

View 9: On the northern side of Pico Boulevard, looking southwest at properties west of the Project Site.

View 10: On the southeastern corner of Pico Boulevard and Beverly Drive, looking northwest at properties north of the Project Site.

View 11: On the southwestern corner of Beverly Drive and Pico Boulevard, looking southeast at properties east of the Project Site.

View 12: On the western side of Beverly Drive, looking southeast at properties southeast of the Project Site.

Source: Parker Environmental Consultants, 2020.

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Figure 3.5
Photographs of the Surrounding Land Uses
Views 7-12

with General Plan land use designations of Medium Residential. Refer to Figure 3.5, Views 7 and 8.

C. Description of Project

1. Project Overview

The Proposed Project includes the demolition of an existing car wash, food stand, and office building for the construction, use, and maintenance of a six-story mixed-use building with 116 dwelling units. The Proposed Project includes six residential levels above grade and two levels of subterranean parking with a total of 134 vehicle parking spaces. The building would be a maximum height of 72 feet above grade at the top of the parapet. Of the proposed 108 dwelling units, 13 units would be reserved for "very low income" households. The Proposed Project includes a total floor area of 96,871 square feet, resulting in a floor area ratio (FAR) of 3.75:1. A summary of the Proposed Project is provided in Table 3.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 3.6, Site Plan. The floor plans are illustrated in Figures 3.7 through 3.11.

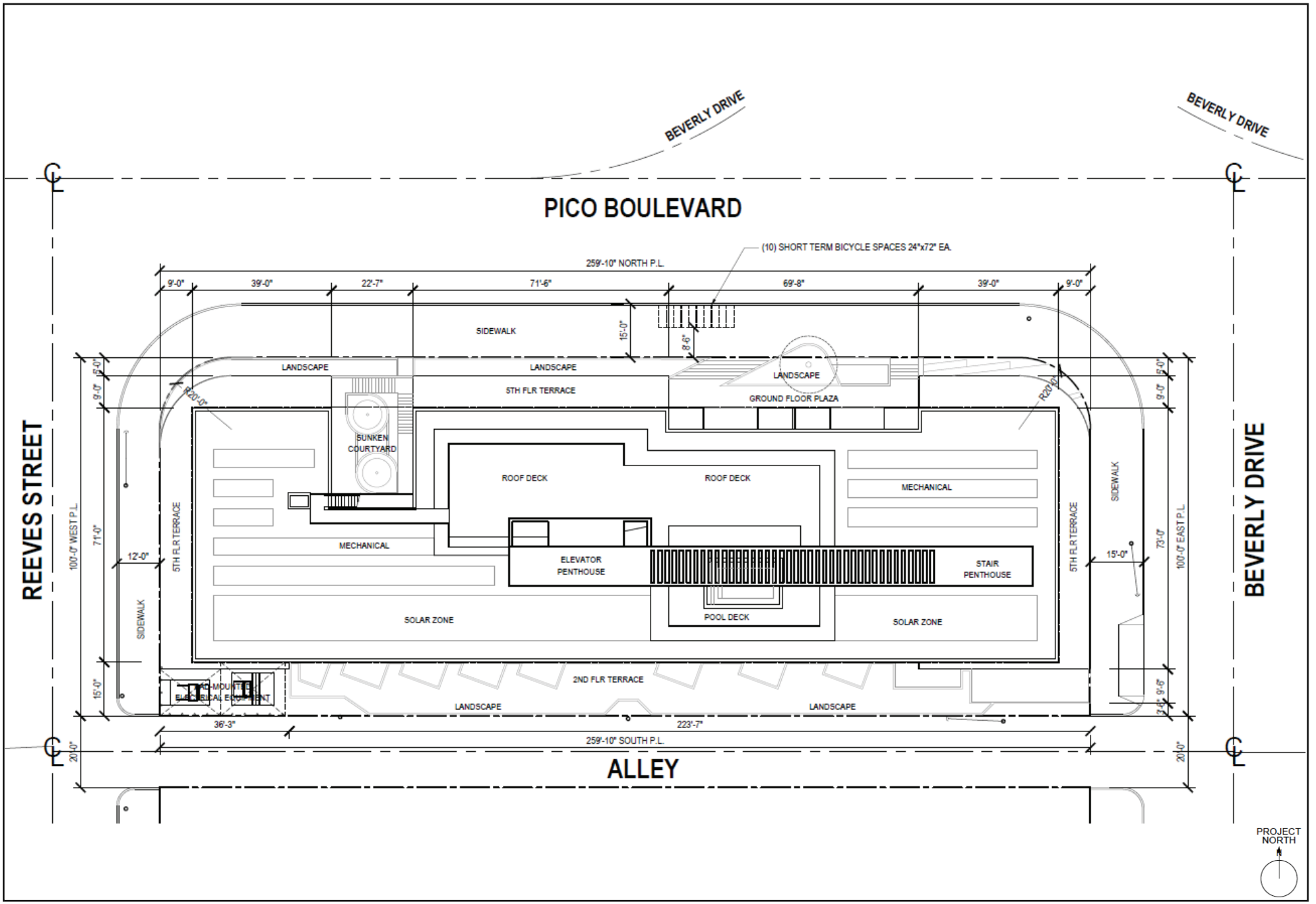
Table 3.2
Proposed Development Program

Land Uses	Quantity	Proposed Floor Area (square feet)
Proposed Project		
Residential (108 dwelling units)		
Studio	35 du	93,621 sf [a]
One-Bedroom	51 du	
Two-Bedroom	16 du	
Three-Bedroom	6 du	
Commercial		
Restaurant	--	1,000 sf
Retail	--	2,250 sf
	TOTAL:	**96,871 sf (3.75:1 FAR)**

Notes: du = dwelling unit; sf = square feet
[a] *Includes residential support areas such as amenities, lobby, and open space areas.*
Source: Abramson Architects, July 14, 2020.

Residential Uses

As shown in Table 3.2, above, the Proposed Project would include a maximum of 108 dwelling units with approximately 93,621 square feet of residential floor area (including circulation and



Source: Abramson Architects, July 14, 2020.

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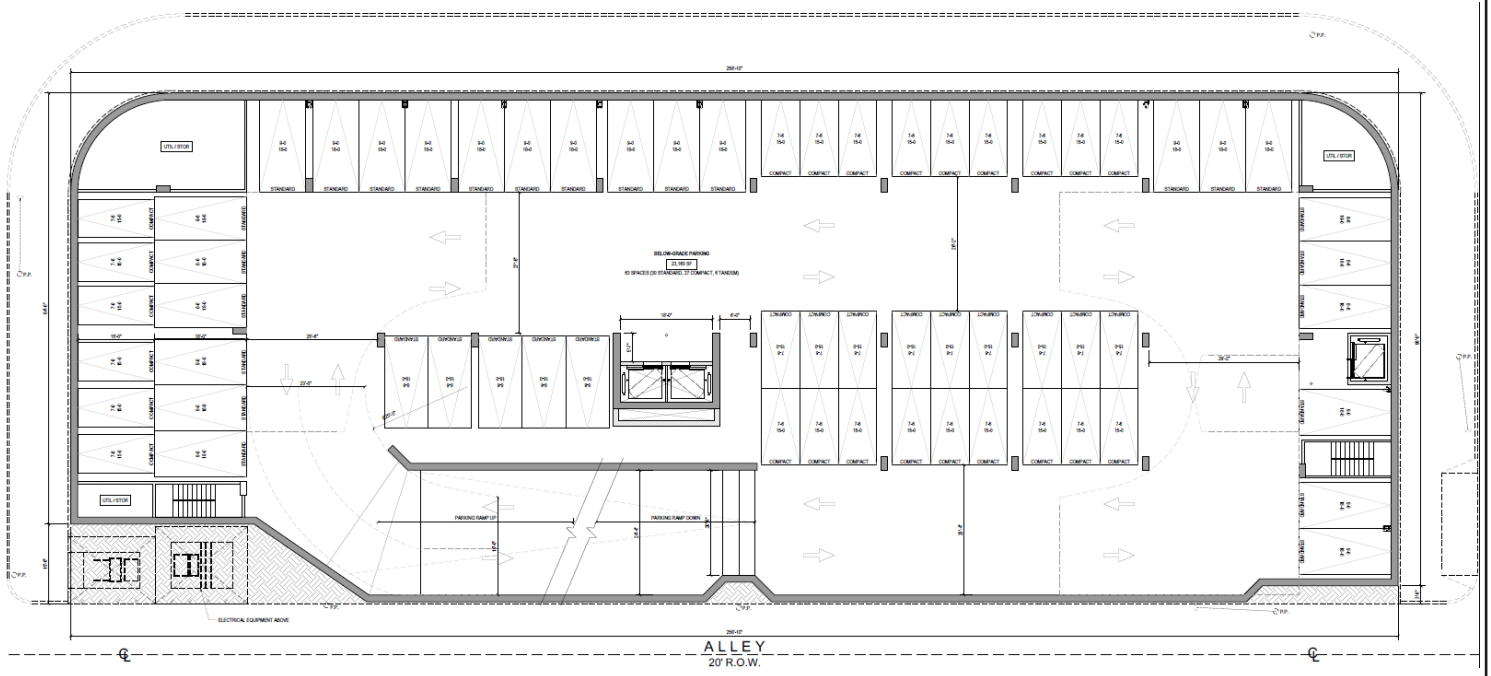
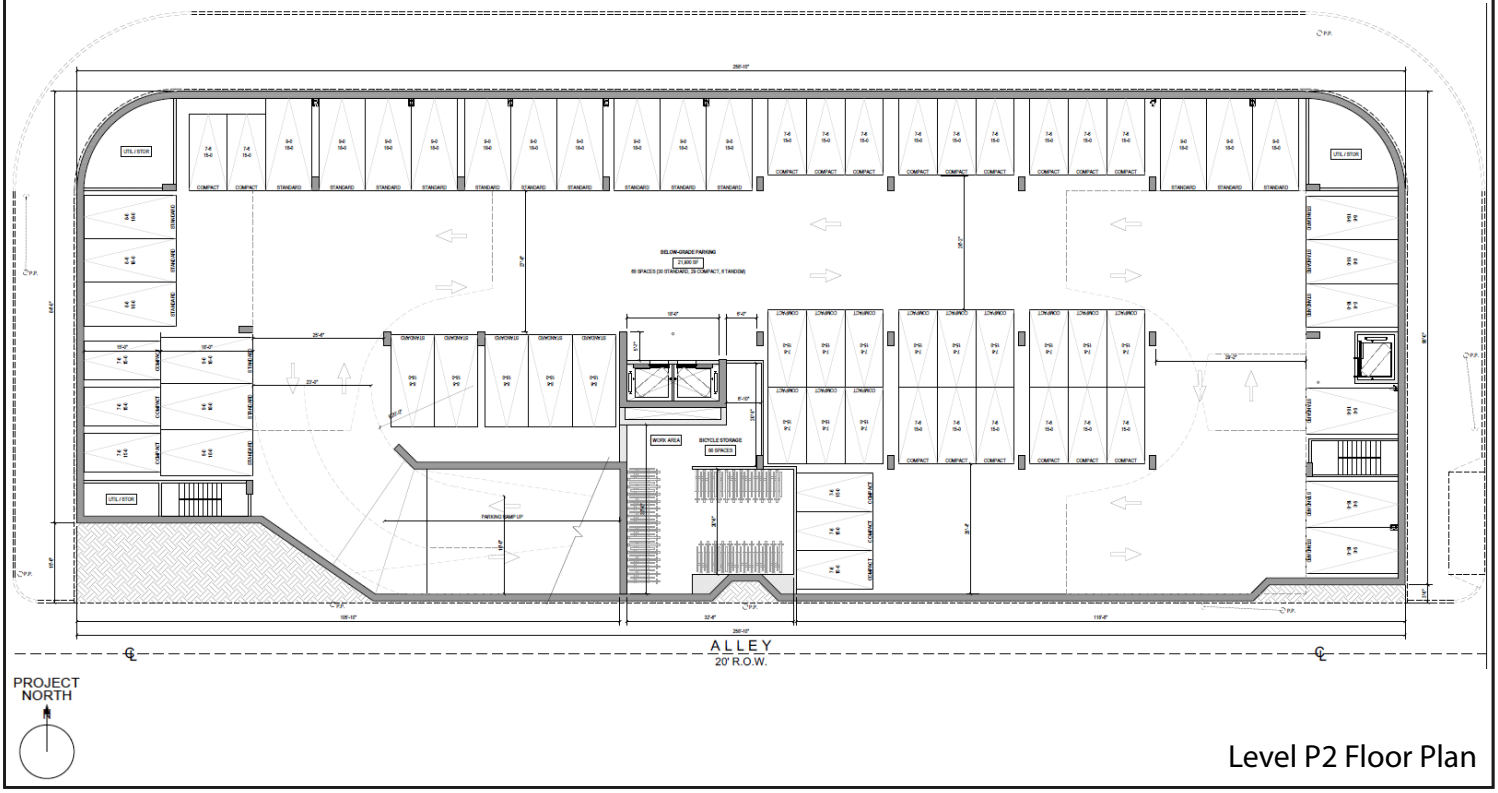
Figure 3.6
Site Plan



Level P1 Floor Plan



Level P2 Floor Plan

Source: Abramson Architects, July 14, 2020.

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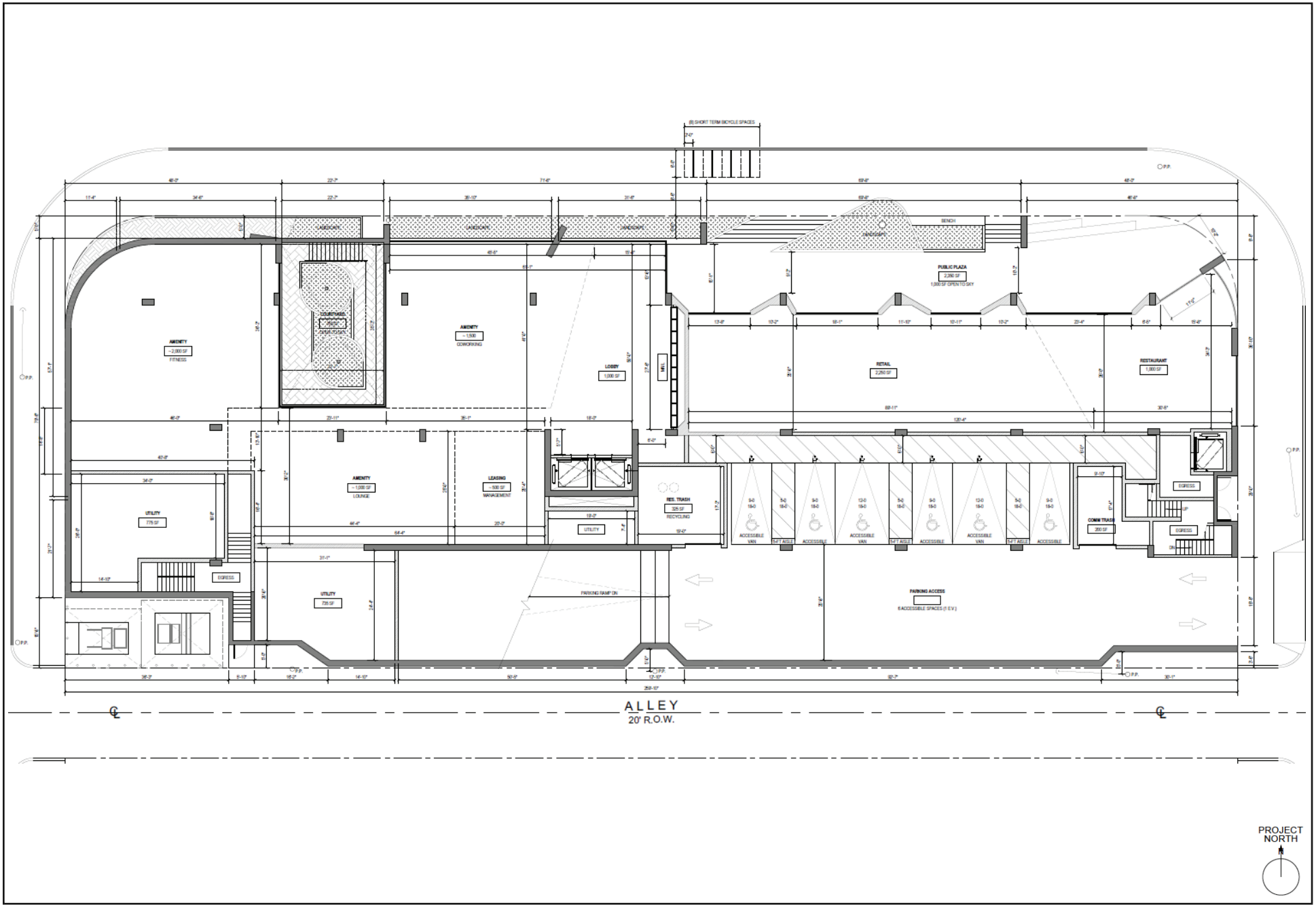
Figure 3.7
Level P1 and P2 Floor Plans



Source: Abramson Architects, July 14, 2020.

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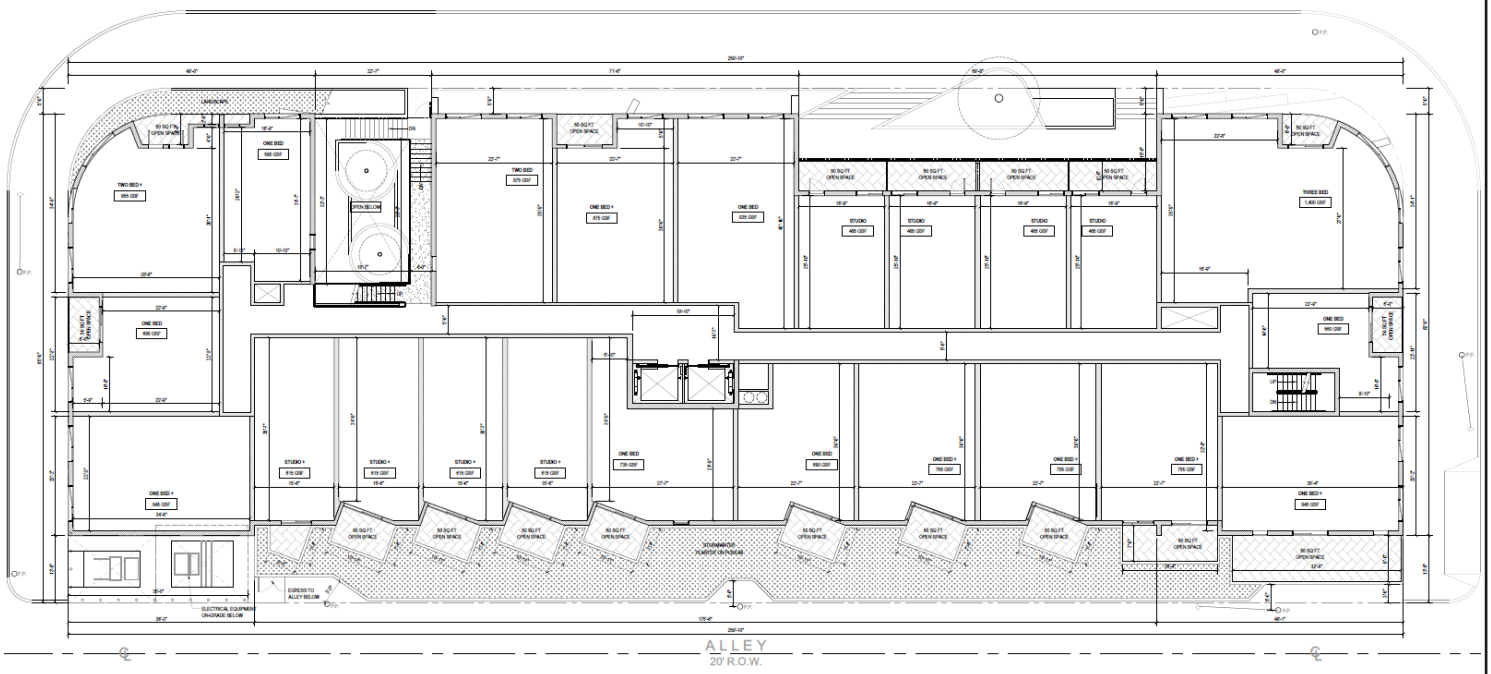
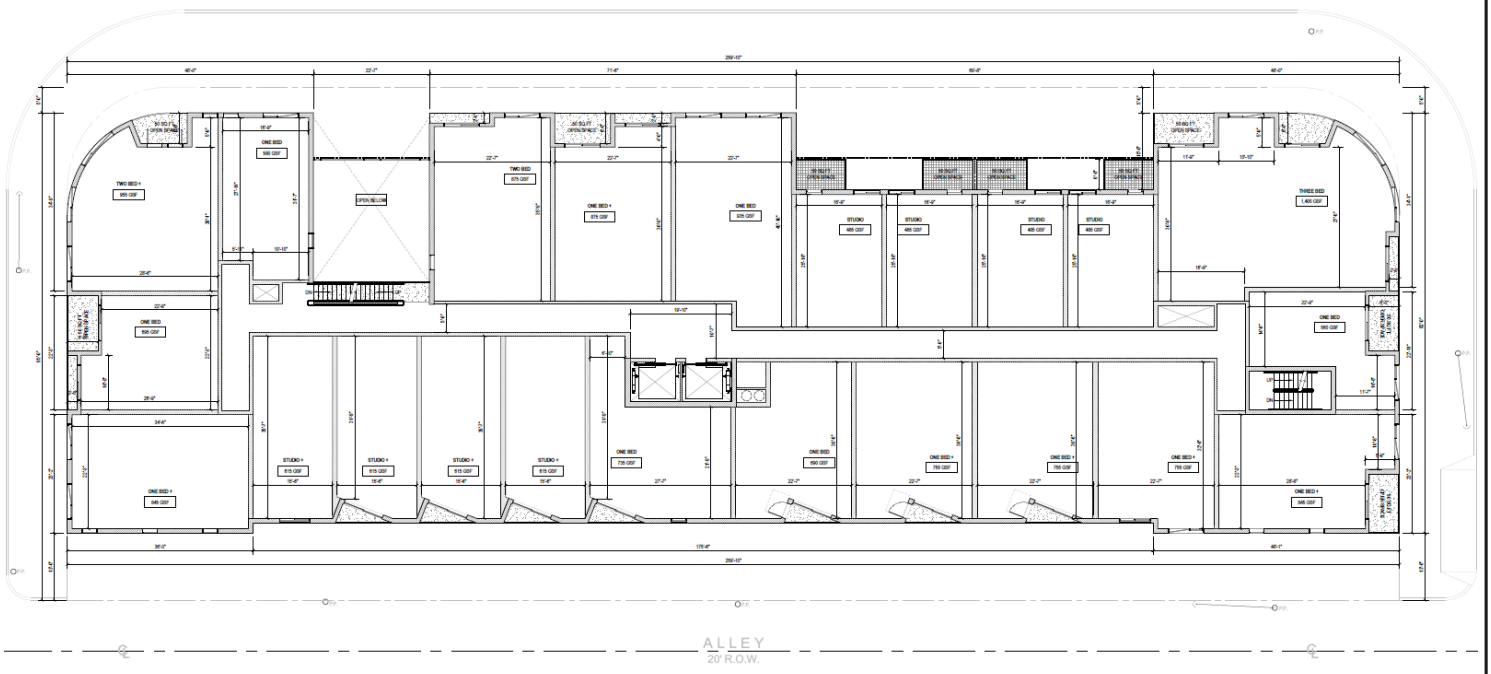
Figure 3.8
Ground Floor Plan



Level 2 Floor Plan



Level 3 Floor Plan

Source: Abramson Architects, July 14, 2020.

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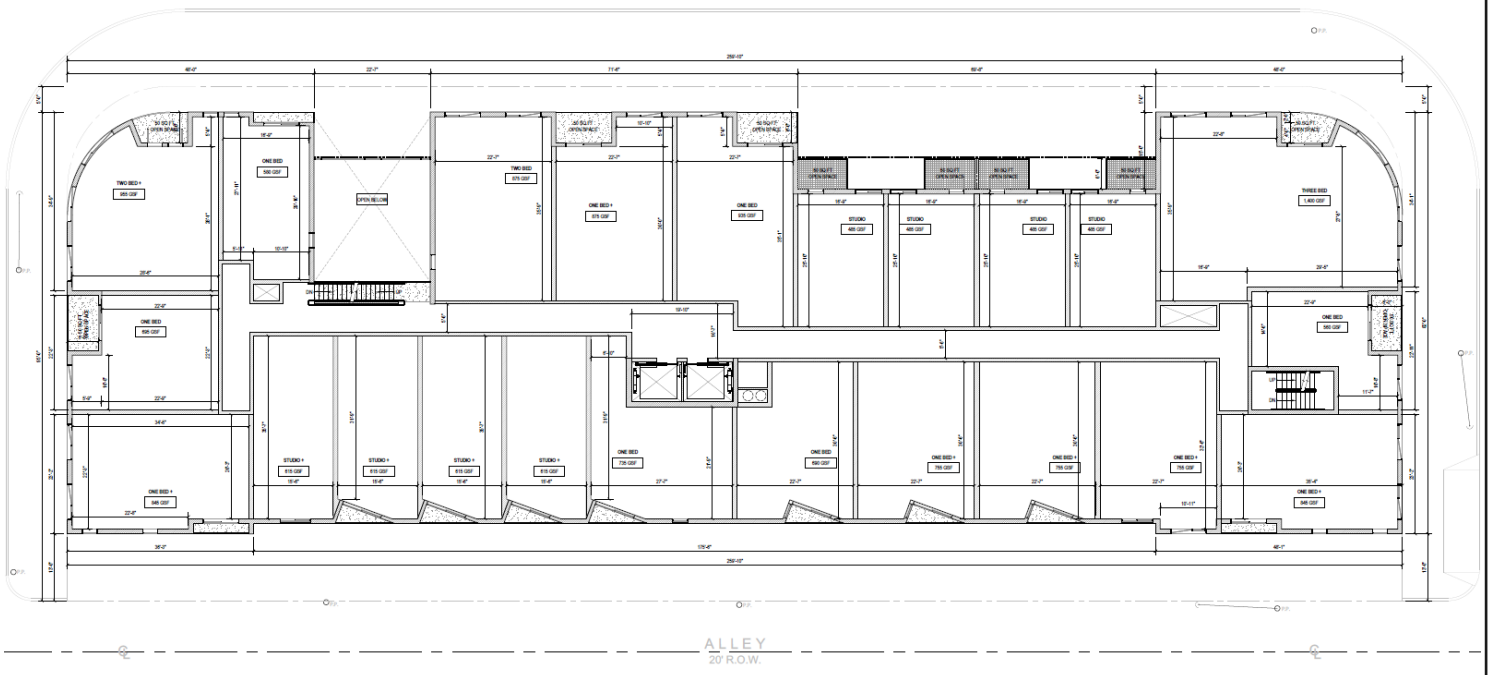
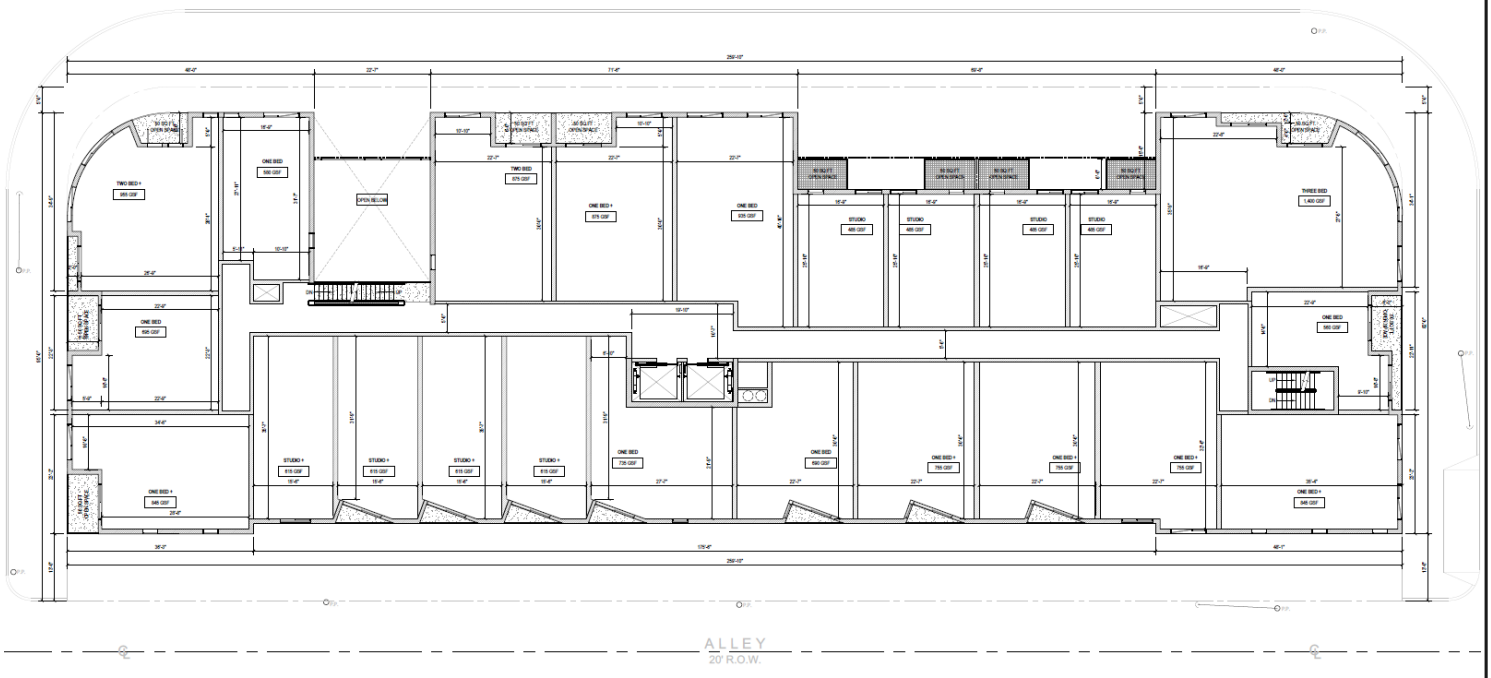
Figure 3.9
Level 2 and Level 3 Floor Plans



Level 4 Floor Plan



Level 5 Floor Plan

Source: Abramson Architects, July 14, 2020.

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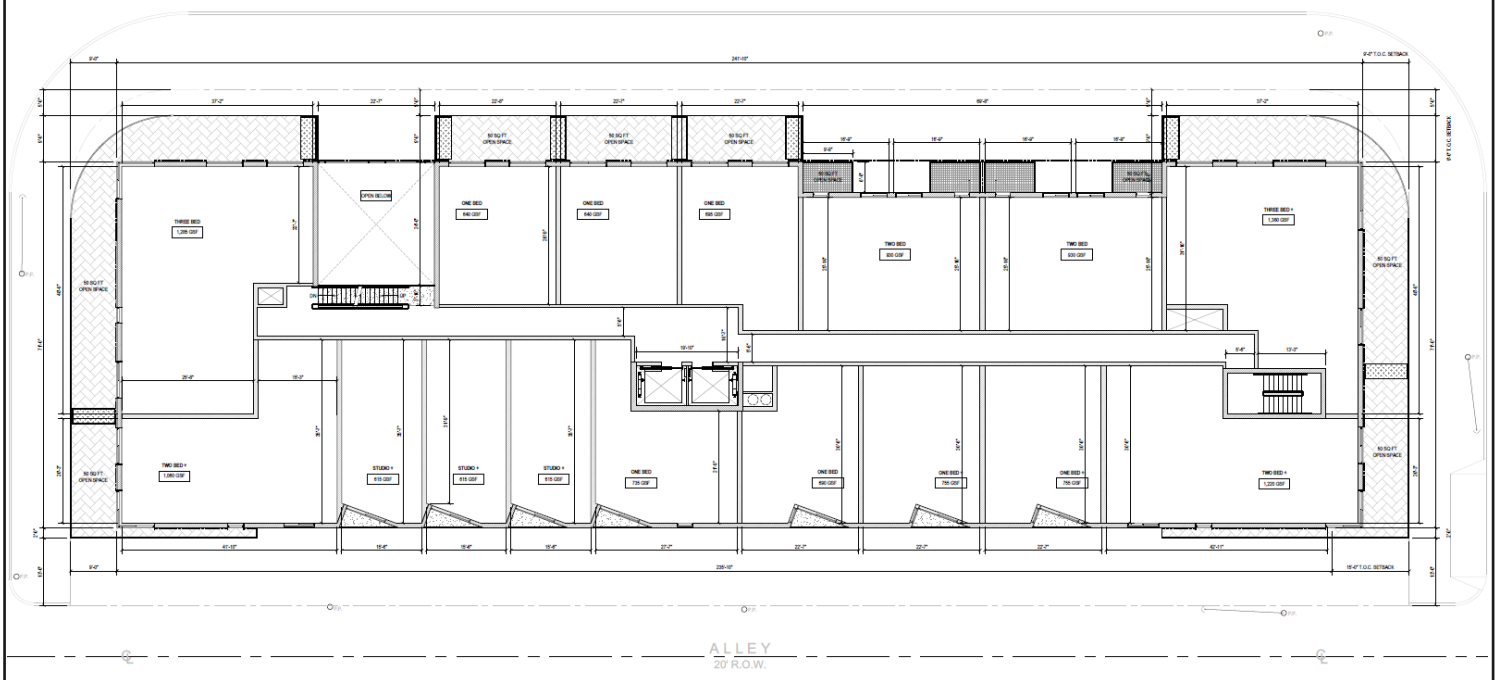
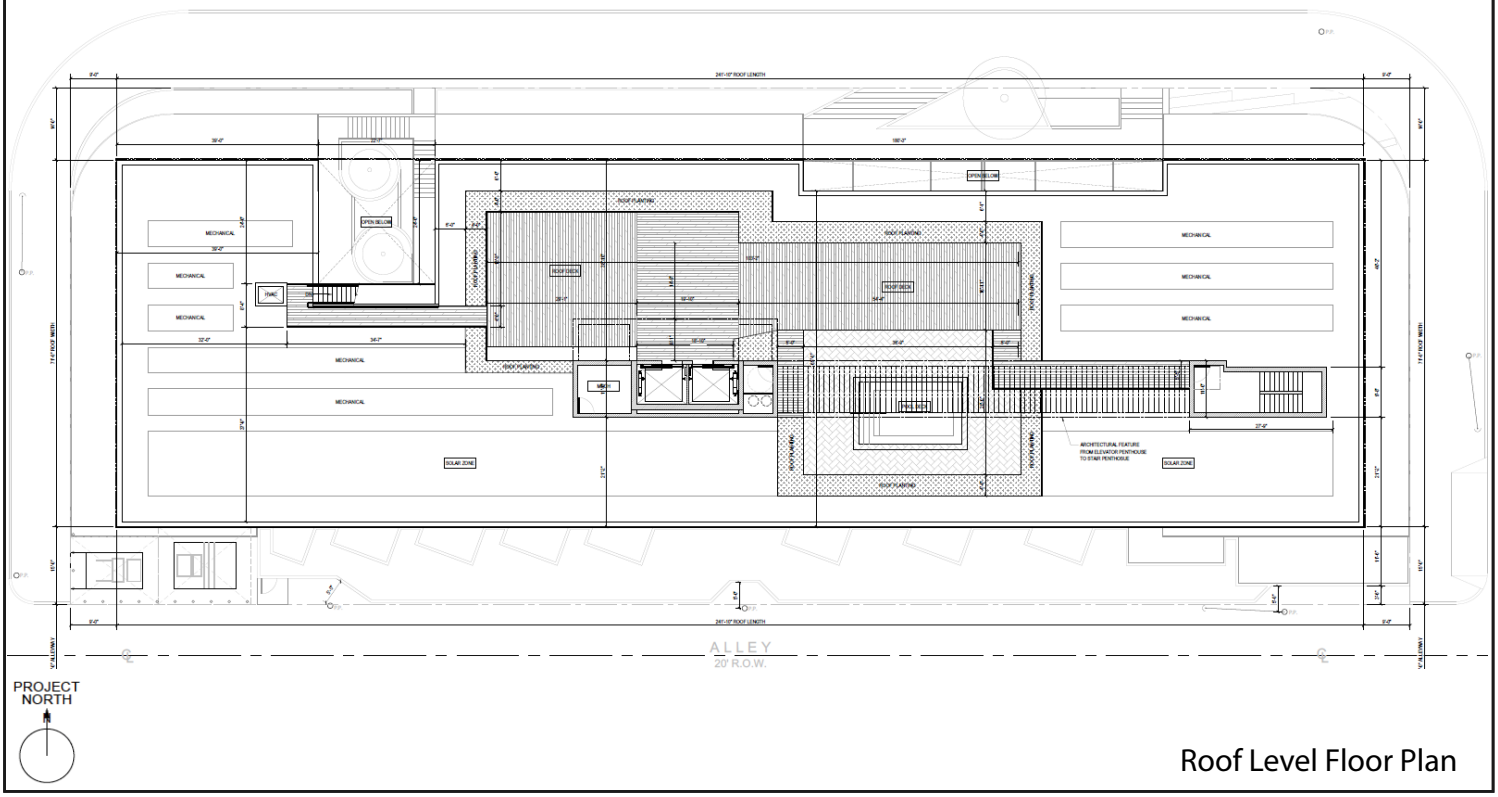
Figure 3.10
Level 4 and Level 5 Floor Plans



Level 6 Floor Plan



Roof Level Floor Plan

Source: Abramson Architects, July 14, 2020.

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Figure 3.11
Level 6 and Roof Level Floor Plans

amenity areas). The unit mix includes 35 studio units, 51 one-bedroom units, 16 two-bedroom units, and six three-bedroom units. Of the 108 proposed residential units, 17 percent of the base density units (13 units) would be reserved at the “very low income” level. The dwelling units would be located on levels two through six.

The building would include a residential lobby located on the ground floor providing access to residents and visitors. Residential amenities would be provided throughout the building, which would include a ground-floor plaza, courtyard, amenity rooms, roof deck, and private open space.

3. Floor Area

The Project Site includes a gross lot area of 25,832.4 square feet. Development on the Project Site is limited to a floor area ratio of 1.5:1 based on existing zoning. Pursuant to LAMC Section 12.22 A.25(g)(3), in exchange for setting aside 17 percent of the base density as very low-income housing units, the Proposed Project is eligible to receive development incentives, including an off-menu incentive to increase the allowable FAR to a maximum of 3.75:1, resulting in an allowable floor area of 96,871 square feet. The Proposed Project includes approximately 96,871 square feet of floor area, resulting in a FAR of 3.75:1.

4. Density

Under its zoning designation, residential uses proposed on a C4 zone shall be in compliance with the density regulations of the R4 Zone. As such, the minimum lot area per dwelling unit is 400 square feet. Pursuant to LAMC Section 12.22.C.16, the area of one-half of the alley may be included for purposes of calculating density. With the addition of the area of one-half of the alley (2,600 square feet), the total area for the density calculation is 28,432.4 square feet. Therefore, a base density of 72 dwelling units is allowed for the Project Site. Pursuant to LAMC Section 12.24 U.26, the Applicant is requesting a conditional use to increase density by 50 percent, allowing up to 108 dwelling units. The Proposed Project proposes a total of 108 dwelling units.

5. Building Height

As stated previously, the Project Site is located in Height District 1VL, which limits the height of the development to 45 feet or three stories. For buildings used entirely for residential, development is limited by the height of 45 feet, and not three stories. Pursuant to LAMC Section 12.22 A.25, in exchange for setting aside 17 percent of the base density as very low-income housing units, the Proposed Project is eligible to receive development incentives, including an off-menu incentive to increase the allowable height to 72 feet and six stories above grade. The proposed six-story building is planned for a maximum roof height of 72 feet above grade and would reach a maximum height of 82 feet at the highest architectural element. Refer to Figure 3.12 and Figure 3.13 for the elevations of the proposed building.

SOUTH ELEVATION (ALLEY FRONTAGE)

NORTH ELEVATION (PICO BOULEVARD FRONTAGE)

Source: Abramson Architects, July 14, 2020.

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Figure 3.12
North and South Elevations

WEST ELEVATION
(REEVES STREET FRONTAGE)

EAST ELEVATION
(BEVERLY DRIVE FRONTAGE)

Source: Abramson Architects, July 14, 2020.

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Figure 3.13
West and East Elevations

Pedestrian View of Northeast Corner
(Traveling West on Plco Blvd)

Pedestrian View of Northwest Corner
(Traveling East on Plco Blvd)

Pedestrian View of Southeast Corner

Pedestrian View of Southwest Corner

Source: Abramson Architects, July 14, 2020.

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Figure 3.14
Architectural Renderings

6. Design and Architecture

The Proposed Project is a six-story multi-family residential building designed with modern architectural materials including rooftop solar zones and pool deck. Architectural renderings of the Proposed Project are provided in Figure 3.14.

7. Setbacks

Pursuant to LAMC Section 12.16(C), no front, side, or rear yard setbacks are required in the C4 Zone for commercial developments. For mixed-use buildings, pursuant to LAMC Section 12.22A.18(c)(3), no yard requirements shall apply to the residential portions of buildings located on lots in the CR, C1, C1.5, C2, C4, and C5 Zones used for combined commercial and residential uses, if such portions are used exclusively for residential uses, abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. As such, no setbacks are required for the Proposed Project. Nevertheless, the Proposed Project would provide a 5-foot front yard setback fronting Pico Boulevard, 9-foot side yard setbacks fronting Reeves Street and Beverly Drive, and a 15-foot rear yard setback along the alleyway.

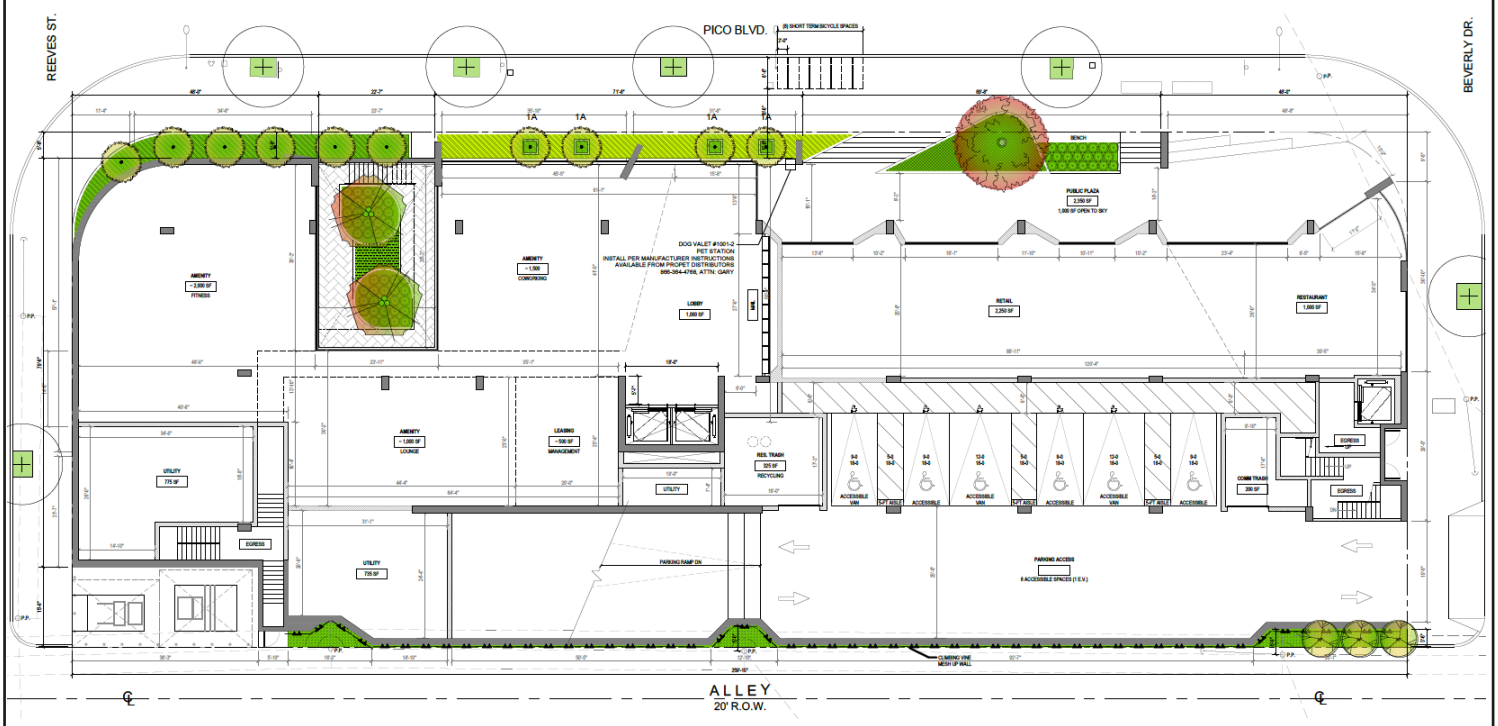
8. Open Space and Landscaping

The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 3.3, Summary of Required and Proposed Open Space Areas, below. The Proposed Project would be required to provide 12,600 square feet of open space. The Proposed Project would provide approximately 12,600 square feet of open space in the form of a courtyard, plaza, amenity rooms, roof deck, and private open space. The Proposed Project would be required to provide a minimum of one tree per every four units for a total of 27 required trees on-site. The Proposed Project would provide 27 trees on-site. Figure 3.15 and Figure 3.16 includes the landscape plans for the Proposed Project.

Table 3.3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	Dwelling Units [a]	Required Open Space (square feet)
Less than 3 Habitable Rooms (100 sf/du)	60	6,500
Equal to 3 Habitable Rooms (125 sf/du)	36	5,125
More than 3 Habitable Rooms (175 sf/du)	12	1,750
TOTAL:	**108**	**12,600**
Proposed Open Space Area	**Proposed Open Space (square feet)**	
Ground Floor Plaza	1,000	
Ground Floor Amenities	3,150	
Sunken Courtyard	750	
Rooftop Decks	4,700	
Private Balconies	3,000	
TOTAL:	**12,600 sf**	

Notes: du = dwelling unit; sf = square feet
[a] *Breakdown of dwelling units based on number of habitable rooms provided by architect.*
Source: Abramson Architects, July 14, 2020.



Ground Level Landscape Plan

Level 2 Landscape Plan

Source: Courtland Studio, LLC; September 14, 2020.

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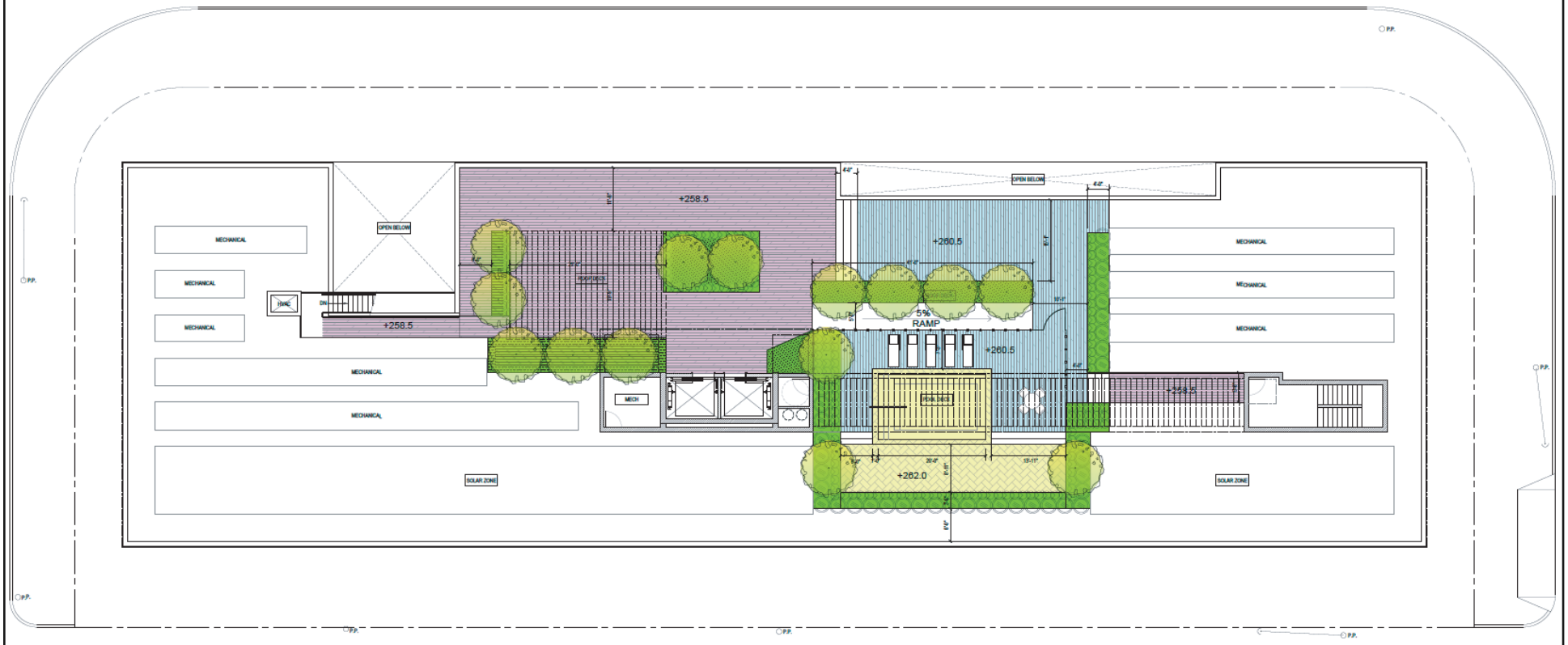
Figure 3.15
Ground and Second Level Landscape Plans



PROJECT NORTH

Source: Abramson Architects, September 14, 2020.

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Figure 3.16
Roof Level Lanscape Plan

9. Access, Circulation, and Parking

Parking for the proposed residential uses on-site would be provided within two levels of subterranean parking. Vehicular access to the subterranean parking garage would be provided via a full-access driveway along Beverly Drive on the southeast corner of the Project Site. Pursuant to LAMC Section. 12.22.A.25(d)1 and Density Bonus Parking Option #1, the Proposed Project would require one parking space for each unit with 0-1 bedroom, 2 parking spaces for each unit with 2-3 bedrooms, and 2.5 parking spaces for each unit with 4- or more bedrooms. Via utilization of Parking Option #1 as well as a 10% residential bicycle parking reduction via LAMC Section 12.21 A.4, the Proposed Project would be required to provide 117 residential parking spaces. The Proposed Project would include 120 residential parking spaces.

Pursuant to LAMC Section 12.21 A.4(c), the Proposed Project is required to provide one parking space per 200 square feet of small restaurant space and one parking space per 250 square feet of retail space. As such, the Proposed Project requires a total of 14 commercial vehicle parking spaces. The Proposed Project would provide a total of 134 parking spaces within the parking garage (120 residential spaces and 14 commercial spaces). Therefore, as summarized in Table 3.4, the Proposed Project would be consistent with the applicable parking requirements with approval of the requested entitlements.

Table 3.4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required [a, b]		Parking Provided
		Rate	Spaces	
Residential (108 dwelling units)				
0-1 bedroom	86 du	1 per du		
2-3 bedrooms	22 du	2 per du		
4 or more bedrooms	0 du	2.5 per du	0	
Subtotal Residential Option #1:			***130***	
10% Reduction via LAMC 12.21.A.4			***-13***	
Subtotal Residential:			***117***	***120 [c]***
Commercial				
Restaurant	1,000 sf	1 per 200 sf	5	
Retail	2,250 sf	1 per 250 sf	9	
Subtotal Commercial:			***14***	***14***
TOTAL:			**180**	**134**

Notes:
du = dwelling unit, sf = square feet
[a] *Pursuant to LAMC Section 12.21 A.4(a).*
[b] *Some dwelling units have bonus rooms which are considered extra habitable rooms.*
[c] *The Applicant is utilizing Density Bonus Parking Option #1 and a 10% Bicycle Parking reduction resulting in 117 residential vehicle spaces required.*
Source: Abramson Architects, July 14, 2020.

The Proposed Project provides on-site bicycle parking for short-term and long-term bike storage. As summarized in Table 3.5, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces in providing 91 total

short- and long-term spaces on-site. In the event the number of dwelling units is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements.

Table 3.5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Required [a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Residential [b,c]					
Units 1-25	25	2	25	27	
Units 26-100	75	5	50	55	
Units 101-108	8	1	4	5	
Commercial [d]					
Commercial	3,250 sf	2	2	4	
TOTAL:		**10**	**81**	**91**	**91**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21 A.16. Bicycle Parking and Shower Facilities, revised May 9, 2018.*
[b] *Short-term bicycle rates for residential uses are as follows: 1 space per 10 units for first 25 units; 1 space per 15 units for units 26-100, and 1 space per 20 units for units 101-108.*
[c] *Long-term bicycle rates for residential units are as follows: 1 space per unit for first 25 units; 1 space per 1.5 units for units 26-100, and 1 space per 2 units for units 101-108.*
[d] *Commercial uses including restaurant shall provide both short- and long-term parking at a rate of one space per 2,000 sf.*
Source: Abramson Architects, March 27, 2020.

10. Lighting and Signage

Exterior lighting features within the Proposed Project would consist of low level illuminated pedestrian walkways and lighting within common open space areas, parking areas, and outdoor courtyards. On-site signage would include site identity and wayfinding signs in accordance with the LAMC.

11. Site Security

During construction, the Project Site would be secured with perimeter fencing and monitored by on-site security personnel. During Project operations, security would be provided via site planning and secured access points of entry. The plans for the Proposed Project will incorporate design guidelines as identified in the “Design Out Crime Guidelines: Crime Prevention Through Environmental Design”, published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

12. Sustainability Features

The Proposed Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. As further described in the Energy section in the IS/ND below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Proposed Project's energy consumption. Additionally, the Proposed Project would provide rooftop solar zones throughout the roof of the building, which would further reduce the electricity demand of the Proposed Project. The Proposed Project would also provide a total of 15 electric-vehicle (EV) charging stations pursuant to the L.A. Green Building Code.

13. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2023. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

This phase would include the demolition/site clearing of the car wash, food stand, and office building on the Project Site. In addition, this phase may include the removal of the fences, trees, walls, and associated debris to construct the six-story mixed-use building. The demolition and site clearing phase would be completed in approximately one month.

Grading, Excavation, and Foundation Phase

After the completion of the site clearing phase, the grading and excavation phase for the Proposed Project would occur for approximately three months and would involve excavation and grading for the two-level subterranean garage to ensure the proper base and slope for the building foundations. The Project proposes to export and haul up to 21,040 cubic yards of soil off site.

Building Construction Phase

The building construction phase consists of above grade structures and is expected to occur for approximately 16 months. The building construction phase includes the construction of the proposed building, connection of utilities to the building, building foundations, parking structure, laying irrigation for landscaping, and landscaping the Project Site.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately four months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing and paint would be applied, and the installation of windows, doors, cabinetry, and appliances within the dwelling units would take place.

Temporary Right-of-Way Encroachment

Construction activities would necessitate temporary lane closures on Pico Boulevard, Beverly Drive, and Reeves Street, adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to reduce any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in the Transportation analysis below, a Construction Management Plan shall be submitted to LADOT review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on Pico Boulevard, Beverly Drive, and Reeves Street, fronting the Project Site, will be maintained and protected from the active construction site. Temporary detours would be coordinated with the City on an as needed basis.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. There are two dozen construction debris waste transfer stations located throughout the southern California region. For recycling efforts, the Southern California Disposal, located at 1908 Frank Street in Santa Monica, accepts construction and demolition waste for recycling and is located approximately 6 miles (driving distance) west of the Project Site (approximately 12 miles round trip). Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Chiquita Canyon landfill, which accepts construction and demolition debris from areas within the City of Los Angeles. The Chiquita Canyon Landfill is approximately 38 miles north of the Project Site (approx. 76 miles round trip). Soil export debris is an inert material and would be hauled to the Azusa Land Reclamation, which accepts inert

solid waste. Azusa Land Reclamation is located approximately 33 miles east of the Project Site (approx. 66 miles round trip).

The proposed haul route exiting and entering the Project Site to the Chiquita Canyon Landfill, Southern California Disposal facility, or Azusa Land Reclamation facility would travel along Pico Boulevard and utilize the Cotner Avenue on-ramp and Olympic Boulevard/Pico Boulevard off-ramp to and from the I-405 San Diego Freeway. The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

14. Related Projects

In accordance with CEQA Guidelines Section 15064(h), this IS/ND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular*

requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table 3.6, Related Projects List, below. A total of eight related projects were identified within the vicinity of the Project Site in the City of Los Angeles and City of Beverly Hills. An analysis of the cumulative impacts associated with these related projects and the Project are provided under each individual environmental impact category in Section 4 of this IS/ND. The locations of the related projects are shown in Figure 3.17, Location of Related Projects.

Table 3.6
Related Projects

Project Number	Project Name	Location/Address	Project Description	Size	Units
City of Los Angeles Projects					
1	Yeshiva School of Los Angeles II	9760 W. Pico Blvd.	High School Community College Synagogue	350 100 100	stu stu per
			High School (to be removed) *Community College (to be removed)* *Synagogue (to be removed)*	*(200)* *(200)* *(25)*	*stu* *stu* *per*
2	9300 W. Pico Blvd	9300 W. Pico Blvd.	Apartment Banquet Hall	65 9,966	du sf
			Banquet Hall (to be removed) *Retail (to be removed)*	*(8,269)* *(1,237)*	*sf* *sf*
3	Robertson Hotel Project	1434 S. Robertson Blvd.	Hotel	122	room
City of Beverly Hills Projects					
4	Etco Homes	9212 Olympic Blvd.	Office Restaurant Retail	13,344 1,000 47,000	sf sf sf
5	Harkham Hillel Hebrew Academy Expansion Project	9120 Olympic Blvd.	Private School	754	stu
			Private School (to be removed)	*(655)*	*stu*
6	9230 Olympic Blvd.	9230 Olympic Blvd.	High-Turnover Restaurant Office	1,326 20,884	sf sf
			Office (to be removed)	*(7,573)*	*sf*
7	340 S. Rexford Dr.	340 S. Rexford Dr.	Condominium	3	du
8	309-325 S. Elm Dr.	309-325 S. Elm Dr.	Condominium	30	du

Notes:
du = dwelling unit, sf = square feet, stu = student, per = person
Source: Crain & Associates, January 2020.

Source: Crain & Associates, 2020.

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Figure 3.17
Location of Related Projects

D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to **LAMC Section 12.22.A.25**, for the proposed 108-unit mixed use housing development, the Applicant requests a Density Bonus consistent with the request above as well as four Off-menu incentives and/or waivers pursuant to LAMC Section 12.22 A.25(g)(3). They include:
   i. An Off-menu incentive to increase the allowable floor area ratio from 1.5:1 to 3.75:1
   ii. An Off-Menu incentive to increase the allowable height from 45 feet and 3 stories to 72 feet and 6 stories.
   iii. An Off-menu waiver to provide 63 residential compact stalls and 52% of the residential parking stalls as compact stalls in lieu of the requirement of LAMC Sect. 12.21.A.5(c) that there be one standard stall for each of 108 dwelling units.
   iv. An Off-Menu incentive to waive the required commercial loading space per LAMC Sect. 12.21.C.6.d.

2. Pursuant to **LAMC Section 12.24 U.26**, the Applicant requests a Conditional Use to allow a density increase of 50 percent to permit 108 units. In exchange for being eligible to receive the 50 percent increase, the Project is required to set aside 17 percent of the base density for Very Low Income units.

3. Pursuant to **LAMC Section 16.05**, the Applicant requests the approval of Site Plan Review findings for a development project which creates, or results in, an increase of 50 or more dwelling units.

In addition, pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to, the following: demolition including street trees, excavation, shoring, grading, foundation, and building and tenant improvements.

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INITIAL STUDY / NEGATIVE DECLARATION

Section 4. Environmental Checklist and Impact Analysis

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387), as amended on January 1, 2021.

I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes a proposal to develop or allow development in an existing natural open space area or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

As shown in the site photographs depicted in Figure 3.4, Photographs of the Project Site, and Figure 3.5, Photographs of the Surrounding Uses, the Project Site is currently occupied by a car wash, food stand, and office building. The Proposed Project would include the demolition and site clearing of the Project Site to allow for the development and operation of six-story mixed-use residential and commercial building. Views in the vicinity of the Project Site are largely constrained by adjacent buildings. No locally designated or protected scenic views are provided from or through the Project Site. The Proposed Project is located in an urbanized area of the West Los Angeles Community Plan area. The Proposed Project would not block or detract from the existing valued aesthetic quality of a public scenic vista. As such, the Proposed Project would not have a substantial adverse effect on a scenic vista, and a less than significant impact would occur.

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

Less Than Significant Impact. A significant impact may occur if scenic resources would be damaged and/or removed by development of a project. The Project Site is currently developed with a car wash, food stand, and office building. The existing buildings are not listed on the National Register, California Register, or local listing. The Project Site does not contain any historic structures or scenic resources on site. There are two historical resources in the Project Site area: the Liberty Savings Building, located at 1180 S. Beverly Drive to the northeast of the Project Site; and the S&J Biren Floor Coverings Building, located 9563 W. Pico Boulevard to the northwest of the Project Site.[3] Pico Boulevard separates these two historic properties from the Project Site. Therefore, development of the Proposed Project would not negatively affect the physical integrity of any historical resource. Further, there are no significant trees or unique geologic features on-site. The Project Site is not bordered by or within the viewshed of any designated scenic highway as identified in the Mobility Element of the City of Los Angeles General Plan.[4] Therefore, the Proposed Project would have a less than significant impact to scenic resources, historical structures, and scenic highways.

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[3] *Historic Places LA, Los Angeles Historic Resources Inventory, Map View, website: http://historicplacesla.org/map, accessed August 2019.*

[4] *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, September 7, 2016.*

c) In non-urbanized areas, substantially degrade the existing visual character or quality of 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?

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

The Project Site is located within a heavily urbanized and long developed area. The Proposed Project would be required to comply with all applicable building code requirements, including the Los Angeles Municipal Code (LAMC), which requires every building, structure, or portion thereof, to be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. In addition, the removal of graffiti is required pursuant to LAMC Section 91.8104.15, which requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

The proposed mixed-use residential and commercial building would not be out of character with the surrounding land uses and would be compatible with the multi-family residential neighborhood to the south of the Project Site and the commercial land uses along Pico Boulevard. Additionally, the Proposed Project would be designed to comply with applicable design guidelines, which would ensure that the Proposed Project is visually compatible with the surrounding land uses. The Project Site is immediately surrounded by structures that range between one to three stories including the nearby multi-family residential buildings, commercial retail buildings, hotel, and office buildings. Thus, the proposed six-story mixed-use building would not be out of character with the surrounding Project area. Additionally, the Proposed Project would be in compliance with the height limitations established in the LAMC with approval of the entitlement requests. Therefore, the Proposed Project would be consistent with the applicable design guidelines. Thus, impacts related to the general aesthetic appearance, upkeep, and visual character of the Proposed Project would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Proposed Project results in a significant

nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

Lighting for the Proposed Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas largely to provide adequate nighttime visibility for patrons, guests, and visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. To ensure that lighting sources are not directly visible by adjacent properties, the Proposed Project's lighting fixtures would be installed and operated in accordance with Section 99.12.508 – Table A5-602 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). The Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses.

Current vehicular access to the Project Site is provided by two vehicle driveways along Pico Boulevard and two vehicle parking driveways along Beverly Drive that connects to the car wash. The alleyway provides access to rear parking for the office building. The Proposed Project would provide parking within two levels of subterranean parking beneath the proposed building. Vehicular access would be provided along Beverly Drive and would direct vehicular headlights towards the eastern property, the gas station, which would not be considered sensitive to light. Additionally, a moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along Pico Boulevard, Beverly Drive, and Reeves Street. As such, vehicles leaving the Project Site would not substantially increase light in the Project area. Therefore, headlights from vehicles entering or exiting the Project Site along Beverly Drive would not adversely impact surrounding land uses. The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding area. Thus, with code compliance, the Proposed Project would not generate a substantial increase in ambient lighting, as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. The Proposed Project's impacts related to lighting would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. Additionally, as discussed above, the Proposed Project would not substantially increase light in the Project area that may contribute to glare. The

Proposed Project is located in a highly urbanized and developed area, and the Proposed Project's architectural materials and landscaping would prevent unnecessary glare. The Proposed Project's landscaped courtyards and green areas would serve to reduce the building's heat gain and reflective glare potential. Therefore, the Proposed Project's potential impacts related to glare would be at a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses within the West Los Angeles Community in the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval, as may be applicable. The site plan review process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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 Project Site is currently occupied by a car wash, food stand, and office building. The Project Site is also located in an urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[5] Therefore, no impact to agricultural lands would occur.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is zoned C4-1VL-O with a General Plan land use designation of Neighborhood Commercial. The Project Site is not zoned for agricultural production, and there is no farmland at the Project

[5] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed July 2020.*

Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[6] Therefore, no impact would occur.

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

No Impact. The Project Site is zoned C4-1VL-O and has a land use designation of Neighborhood Commercial in the West Los Angeles Community Plan. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is occupied by car wash, food stand, and office building. The Project Site is also located in an urbanized area of the City of Los Angeles. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore, no impact 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. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[7] The Project Site is located in an urbanized area in the West Los Angeles Community within the City of Los Angeles and does not

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[6] *Williamson Act Program, California Division of Land Resource Protection, The Williamson Act Status Report, 2016-2017, website https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed July 2020.*

[7] *Ibid.*

include any State-designated agricultural lands or forest or timberland uses. Therefore, no cumulative impact would occur.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district 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?	☐	☐	☒	☐
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	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 ("2016 AQMP"). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. In addition, the Southern California Association of Governments (SCAG) approved its 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that includes transportation programs, measures, and

strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and State Implementation Plan (SIP) for the South Coast Air Basin ("Basin"), are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP. [8]

As discussed in Section XIV(a), Population and Housing, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2020 RTP/SCS (also known as the Connect SoCal plan) to increase commercial uses within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development within a half of a mile (walking distance) of several Metro and Santa Monica BBB bus lines that connect to regions of the Los Angeles area. Thus, the Project Site's location provides opportunities for employees and patrons to use public transit to reduce vehicle trips. Reports by the California Department of Transportation and SCAG 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.[9,10] As discussed in the Proposed Project's Trip Generation Assessment (See Appendix G of this ND), the Proposed Project's close proximity to other commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS and the 2020 Connect SoCal, as detailed in Section XIV(a), Population and Housing, and Section VIII, Greenhouse Gas Emissions, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

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[8] *In September 2020, SCAG and CARB have since adopted a new 2020 RTP/SCS, now called Connect SoCal. Connect SoCal was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The SCAQMD is currently working on a 2022 AQMP, which will base its analysis from Connect SoCal.*

[9] *California Department of Transportation, California Transportation Plan 2040, June, 2016, website: http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf, accessed August 2019.*

[10] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, April 2016.*

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. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

Proposed Project Increase in Criteria Pollutants

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2023. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) architectural coatings and finishings. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table 4.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development.

As shown in Table 4.1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Table 4.1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing						
On-Site Fugitive Dust	--	--	--	--	0.59	0.09
On-Site Off-Road Diesel Equipment	0.80	7.25	7.57	0.01	0.41	0.39
Off-Site Hauling/Vendor/Worker Trips	0.07	1.09	0.57	<0.01	0.17	0.05
Total Emissions	***0.87***	***8.34***	***8.14***	***0.01***	***1.17***	***0.53***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	0.36	0.19
On-Site Off-Road Diesel Equipment	1.48	15.32	12.62	0.02	0.70	0.66
Off-Site Hauling/Vendor/Worker Trips	0.58	16.59	4.39	0.06	1.54	0.46
Total Emissions	***2.06***	***31.91***	***17.01***	***0.08***	***2.60***	***1.31***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	1.62	15.99	15.99	0.03	0.87	0.81
Off-Site Hauling/Vendor/Worker Trips	0.53	2.30	4.28	0.02	1.28	0.35
Total Emissions	***2.15***	***18.29***	***20.27***	***0.05***	***2.15***	***1.16***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	7.25	--	--	--	0.00	0.00
On-Site Off-Road Diesel Equipment	0.89	6.75	9.43	0.02	0.35	0.35
Off-Site Hauling/Vendor/Worker Trips	0.09	0.05	0.70	<0.01	0.23	0.06
Total Emissions	***8.23***	***6.80***	***10.13***	***0.02***	***0.58***	***0.41***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/ND.

Operational Emissions

Existing Emissions

The Project Site is currently developed with a car wash and office building. The existing uses generate air pollutant emissions from space sources, such as space and water heating, architectural coatings (paint), and mobile sources such as motor vehicle traffic travelling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) recommended by the SCAQMD. As shown in Table 4.2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table 4.2
Existing Daily Operational Emissions from Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	0.32	<0.01	<0.01	0.00	<0.01	<0.01
Energy Sources	<0.01	0.06	0.05	<0.01	<0.01	<0.01
Mobile Sources	1.52	7.33	18.14	0.06	4.67	1.29
Total Emissions	***1.84***	***7.39***	***18.19***	***0.06***	***4.67***	***1.29***
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.32	<0.01	<0.01	0.00	<0.01	<0.01
Energy Sources	<0.01	0.06	0.05	<0.01	<0.01	<0.01
Mobile Sources	1.45	7.47	17.20	0.06	4.67	1.29
Total Emissions	***1.77***	***7.53***	***17.25***	***0.06***	***4.67***	***1.29***

Note: Calculation worksheets are provided in Appendix A to this Draft IS/ND.
Parker Environmental Consultants 2020.

Proposed Project Emissions

The Proposed Project would result in the development of a mixed-use residential and commercial building with 108 dwelling units and 3,250 square feet of commercial space (1,000 square-foot restaurant and 2,250 square feet of retail). Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table 4.3, Proposed Project Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Additionally, some criteria pollutants would be reduced with the Proposed Project, when compared to existing conditions. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

As discussed above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

Table 4.3
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	2.38	0.10	8.93	<0.01	0.05	0.05
Energy Sources	0.04	0.31	0.16	<0.01	0.02	0.02
Mobile Sources	1.11	5.07	12.88	0.05	4.36	1.19
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
Subtotal Project Emissions:	***4.35***	***9.15***	***24.06***	***0.05***	***4.55***	***1.38***
Less Existing Emissions	*(1.84)*	*(7.39)*	*(18.19)*	*(0.06)*	*(4.67)*	*(1.29)*
Net Total Project Emissions:	**2.51**	**1.76**	**5.87**	**(0.01)**	**(0.12)**	**0.09**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area Sources	2.38	0.10	8.93	<0.01	0.05	0.05
Energy Sources	0.04	0.31	0.16	<0.01	0.02	0.02
Mobile Sources	1.17	5.01	13.62	0.05	4.36	1.19
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
Subtotal Project Emissions:	***4.41***	***9.09***	***24.80***	***0.05***	***4.55***	***1.38***
Less Existing Emissions:	*(1.77)*	*(7.53)*	*(17.25)*	*(0.06)*	*(4.67)*	*(1.29)*
Net Total Project Emissions:	**2.64**	**1.56**	**7.55**	**(0.01)**	**(0.12)**	**0.09**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/ND.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[11]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology"

[11] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

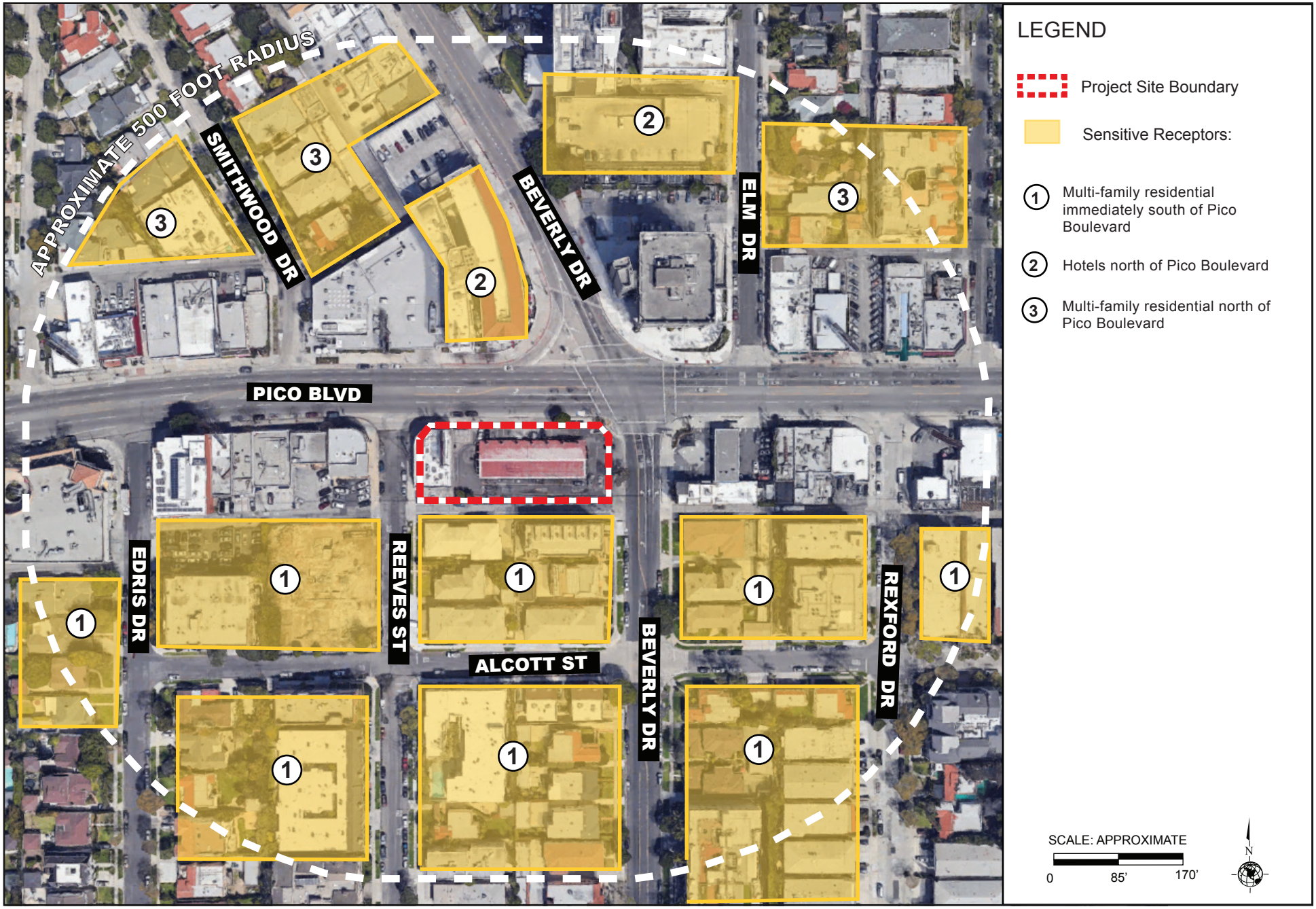
document prepared by the SCAQMD,[12] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 − Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 2, which covers the Northwest Los Angeles County area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the Project Site is approximately 0.59 acres, the one-acre LSTs were applied for the Proposed Project. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are the multi-family residences located to the north, west, and east of the Project Site. Figure 4.1, below, shows the nearest air quality sensitive receptors to the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a one-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 4.4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 2. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

[12] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*



Source: Google Earth, Aerial View, 2019.

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Figure 4.1
Air Quality Sensitive Receptors

Table 4.4
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing	7.25	7.57	1.00	0.48
Grading/Excavation	15.32	12.62	1.06	0.85
Building Construction	15.99	15.99	0.87	0.81
Architectural Coatings	6.75	9.43	0.35	0.35
SCAQMD Localized Thresholds [c]	**103**	**562**	**4**	**3**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

[a] *The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 2 for a Project Site of one acre.*

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

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/ND.

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, the Proposed Project's mobile source emissions would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. The study intersections included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The intersection of Wilshire Boulevard and Veteran Avenue, which is located approximately 1.4 miles northwest of the Project Site, was identified as the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[13] As reported in the 2016 AQMP, the highest concentrations of CO continued to be recorded in the areas of Los Angeles County, where vehicular traffic is most dense, with the maximum 8-hour and 1-hour concentration (4.3 ppm and 3.0 ppm, respectively) recorded in the South Central Los Angeles County area. Thus, as the Basin is still in attainment for CO, and since ambient CO concentrations in the Basin remain lower than the highest recorded CO concentrations in 2003, it can be concluded that the Proposed Project would not

[13] *South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.*

result in a significant localized CO hotspot impact. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 24 months, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (24 out of 840 months equal to a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Due to the Project Site's historic releases of total petroleum hydrocarbons as gasoline (TPHg) and volatile organic compounds (VOCs; namely benzene, toluene, ethylbenzene [BTEX], and fuel oxygenates), Ardent Environmental Group, Inc., was retained to evaluate the potential health related impacts of the Proposed Project due to residual contaminants in soil and soil gas beneath the Project Site. As noted in the Qualitative Health Risk Assessment in Appendix L to this IS/ND, the LARWQCB approved completion of soil remediation and issued a No Further Action (NFA) letter for soil on September 17, 2008.[14] However, since regulatory screening levels have changed since 2008, Ardent reviewed the residual concentrations identified in the confirmation soil boring with current regulatory guidelines. The remaining concentrations of VOCs were well below the federal Environmental Protection Agency (EPA) Regional Screening Levels and the California Department of Toxic Substances Control (DTSC) Screening Levels for the protection of human health through dermal contact, inhalation, and ingestion at residential and industrial/commercial properties. The remaining TPHg concentrations, up to 270 milligrams per kilogram (mg/kg), were also reported below the EPA and DTSC screening levels for industrial/commercial land use of 420 and 500 mg/kg, respectively. As such, no human health

[14] *A copy of the closure letter is provided in Attachment A to Appendix L.*

risks are present for construction workers. Additionally, in compliance with AQMD Rule 1166, any soil showing signs of possible contamination will be segregated for appropriate off-site disposal. Therefore, construction of the Proposed Project would not result in significant impacts associated with the potential release toxic air contaminants during construction.

Operational Emissions

The Proposed Project consists of a mixed-use residential and commercial development. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Proposed Project implementation**.** In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. As noted in the Qualitative Health Risk Assessment provided in Appendix L to this IS/ND, the LARWQCB recently issued a letter requiring a soil vapor assessment due to the site now being planned for mixed use including commercial and residential.[15] Concentrations of petroleum hydrocarbons in soil remaining at 25 feet bgs slightly exceed the human health screening levels for dermal contact, inhalation, and ingestion at residential properties. The proposed building is planned to be constructed with an active depressurization system beneath the foundation due to elevated methane gas and a subterranean ventilated parking structure. Based on these vapor control systems, the exposure route of possible vapor intrusion from off-gassing contaminated soil or groundwater, if any, has been eliminated. Therefore, vapor intrusion is not considered a concern at the site. To meet the LARWQCB requirement, soil gas sampling is planned to be completed after site excavation to determine baseline conditions. The concentrations will be presented to the LARWQCB, along with a detailed description of the soil gas depressurization and parking structure ventilation systems, and a recommendation for no further work. To fulfill the LADBS requirements, the proposed building will be constructed with an active methane ventilation control system. This system will include an impermeable vapor barrier beneath the subterranean parking structure to prevent methane gas from migrating into the site building. Below the vapor barrier, perforated horizontal pipes will be set midway within an 8-inch bed of gravel. A blower will be installed to provide a depressurization system beneath the building pad to evacuate air from the gravel zone and horizontal pipes at a rate of at least three volumes per hour. The evacuated air will be conveyed by piping to ventilation ports at the top of the building.

In addition, the subterranean parking structure will be constructed with a ventilation system that will include exhaust fans as well as fresh air intake fans designed to protect occupants from inhalation of vehicle exhaust. In accordance with the LADBS requirements, the ventilation system will ensure at least four air exchange rates per hour for the lowest level of the parking structure. Additionally, the second level of the parking structure will be ventilated at a rate of

[15] *The LARWQCB's March 5, 2021 correspondence re: the Soil Vapor Assessment Work Plan Requirement is provided as an Appendix to Appendix E.2, Path to Closure Narrative, in this IS/ND.*

approximately two air exchanges per hour in compliance with the California Mechanical Code requirements for parking garages.

As concluded in the Qualitative Health Risk Assessment, residual concentrations of VOCs in soil vapor, if present, would be much lower than the measured methane gas concentrations and expected exhaust fumes that the ventilation systems are designed to mitigate. The use of the proposed ventilation systems would eliminate any exposure route of VOCs to occupants of the site. Based on this information, there would be no human health risk to workers or future occupants of the site through possible vapor intrusion. Therefore, with regulatory oversight and compliance with all requirements from the relevant regulatory agencies, impacts associated with the release of toxic air contaminants would be less than significant.

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

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

During construction, potential sources that may emit odors during construction activities include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1108 and 1113 limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would control objectionable construction odors. Therefore, impacts from potential objectionable odors during construction would be less than significant.

The Proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Odors from garbage chutes and enclosed refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. The trash collection areas would be enclosed and would not be located near any habitable areas. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. With compliance with SCAQMD Rules 402, described above, potential objectionable odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles.

Cumulative development can affect the implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in response to Checklist Question III (b) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Proposed Project's long-term operations. Thus, cumulative odor impacts would be less than significant.

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?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing

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

The Project Site is currently developed with a car wash, food stand, and office building and does not support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, the Proposed Project would not have a direct adverse effect on any species identified as a candidate, sensitive, or special status species. Additionally, the Project Site does not contain any critical habitat of any sensitive species. Vegetation on the Project Site is limited to three trees in the public right-of-way: two trees along Pico Boulevard and one tree along Beverly Drive, which are owned and maintained by the City. The removal and placement of street trees would be subject to the review and approval of the Department of Public Works, Urban Forestry Division. Based on the Tree Report prepared for the Proposed Project, (Appendix J to this IS/ND), none of these street trees are designated protected trees. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the Project Site and within the adjacent public right(s)-of-way. Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected trees.

While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Sections 3503, 3503.5, and 3513 of the California Department of Fish and Game Code.[16] To ensure compliance with the MBTA and California Department of Fish and Game Code, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- Habitat Modification (Nesting Native Birds): Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31

[16] *Sections 3503, 3503.5, and 3513 of the California Fish and Game Code make it unlawful to "take, possess, or needlessly destroy" the nest or eggs of any bird (Section 3503), any bird-of-prey (Section 3503.5), or any migratory nongame bird as designated in the Migratory Bird Treaty Act (Section 3513).*

(as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
    - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
    - Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
    - The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.
    - The Proposed Project shall comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which make it unlawful to “take, possess, or needlessly destroy” the nest or eggs of any bird (Section 3503), any bird-of-prey (Section 3503.5), or any migratory nongame bird as designated in the Migratory Bird Treaty Act (Section 3513).

Thus, adherence to regulatory compliances measures, detailed above, would ensure that the Proposed Project would have a less than significant impact on sensitive biological species or habitat.

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. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently occupied by a car wash, food stand, and office building. No riparian or other sensitive natural community is located on or adjacent to the Project Site, and there are no such areas nearby. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

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. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section 4(b), above) and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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?

No Impact. A project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in an urbanized area within the City of Los Angeles. Due to the urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites on the Project Site or in the Project vicinity. Thus, the Proposed Project would not interfere with the movement of any resident or migratory fish or wildlife. Therefore, no impact would occur.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project would be inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance (No. 177,404). As stated above, the Project Site is currently developed with a car wash, food stand, and office building. One tree are located

within the car wash property, and three street trees border the Project Site along Pico Boulevard and Beverly Drive. The removal and replacement of street trees within the public right of way would be conducted under the approval of the Department of Urban Forestry. Based on the Proposed Project's Tree Report, none of the trees to be removed are protected under a policy or ordinance. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. As such, the Proposed Project would not conflict with a policy or ordinance protecting biological resources and impacts would be less than significant.

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

No Impact. A significant impact would occur if the Proposed Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance. Development of the Proposed Project in combination with related projects would not significantly impact wildlife corridors or habitat for any endangered, threatened, rare, protected, candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance, Federal Migratory Bird Treaty Act, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and the City of Los Angeles Protected Tree Ordinance and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project would result in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[17]

The Project Site is developed with a car wash, food stand, and office building. The Proposed Project involves demolishing the existing structures and constructing a new mixed-use building with a total of 108 dwelling units and 3,250 square feet of commercial space. According to the Los Angeles Historic Resources Inventory, the Project Site does not contain any historic structures or scenic resources on site.[18] Additionally, SurveyLA does not identify any of the on-site structures as potentially historic resources.[19] Because there are no buildings on the Project Site, there are no historic resources on the Project Site that would be listed on the National Register, California Register, or local listing.

There are two potentially historic resources in the Project Site area: the Liberty Savings Building, located at 1180 S. Beverly Drive, approximately 140 feet northeast of the Project Site;

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[17] *CEQA Guidelines, Section 15064.5(b)(1).*

[18] *City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, website: http://historicplacesla.org/map, accessed August 2019.*

[19] *City of Los Angeles, SurveyLA, West Los Angeles – Individual Resources, August 2012, website: http://preservation.lacity.org/files/Individual%20Resources_Final.pdf, accessed August 2019.*

and the S&J Biren Floor Coverings building, located 9563 W. Pico Boulevard, approximately 285 feet northwest of the Project Site.[20] Pico Boulevard separates these two historic properties from the Project Site. The Liberty Savings building is listed as appears eligible for listing in the California Register and for local listing as a Los Angeles Historical-Cultural Monument. The S&J Biren Floor Coverings building is listed as eligible for listings in the National Register, California Register, and Los Angeles Historic-Cultural Monument inventory.[21] The Proposed Project would have no direct impacts on these two potential historic resources. There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have a less than significant impact on the potentially historical resources near the Project Site as the Proposed Project does not directly abut the Liberty Savings Building or the S&J Biren Floor Coverings building and would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree they would no longer be eligible for listing under national, state, or local landmark designation programs. They would continue to be eligible for listing as a historical resource defined by CEQA. No mitigation is required or recommended. Therefore, the development of the Proposed Project would have a less than significant impact to surrounding historical resources.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources.

The Project Site is currently developed with a car wash, food stand, and office building. Thus, the Project Site has been previously disturbed. The Project Site and immediate surrounding areas do not contain any known archaeological resources.[22] To determine whether any known archaeological resources exist in proximity to the Project Site, a records search was conducted with the South Central Coastal Information Center (SCCIC). The SCCIC record search (dated October 15, 2019) is contained in Appendix H.1 to this IS/ND. The SCCIC records search did not identify any known archaeological resources on the Project Site. The SCCIC records search identified no archaeological resources within a ½-mile radius of the Project Site. It is important to note that the archaeological sensitivity of the Project location is unknown because there are no previous archaeological studies for the Project Site. Additionally, the natural ground-surface appears to be obscured by urban development; consequently, surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the Project Site area, buried resources could potentially be unearthed during Project

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[20] *Historic Places LA, Los Angeles Historic Resources Inventory, Map View, website: http://historicplacesla.org/map, accessed August 2019.*

[21] *City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, "Liberty Savings Building" and "S&J Biren Floor Coverings", website: http://www.historicplacesla.org, accessed August 2019.*

[22] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

activities. The reported records search result does not preclude the possibility that surface or buried artifacts may be found during a survey of the property or ground-disturbing activities. Therefore, customary caution and a halt-work condition should be in place for all ground-disturbing activities.

The Proposed Project would include excavation and grading to ensure the proper base and slope for the two-level subterranean garage under the proposed building. Thus, there is a potential for the accidental discovery of unknown and unrecorded archaeological materials. Because the presence or absence of such materials cannot be determined until the Project Site is graded and excavated, the City's standard condition of approval for addressing inadvertent discoveries shall be incorporated into the Proposed Project's approval. The City's standard condition of approval requires that upon any discovery of a potential archaeological resource, the Applicant shall immediately stop all ground disturbance activities in the area of the find until a qualitied archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and assorted materials. Construction activity may continue unimpeded on other portions of the Project Site. Therefore, with the implementation of regulatory compliance measures, such as California Public Resources Code Section 21083.2, and the City's standard conditions of approval for addressing inadvertent discoveries of archaeological resources, potential impacts to archaeological resources encountered at the Project Site would be less than significant without mitigation.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with regulatory measures. Therefore, the Proposed

Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts 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?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. A significant impact would occur if the Proposed Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Proposed Project would include the construction of a mixed-use building with a total of 108 dwelling units and 3,250 square feet of commercial space on an infill site, which would contribute to the revitalization of the West Los Angeles Community Plan area. This analysis focuses on the effect of the Proposed Project and the new buildings to be constructed as part of the Proposed Project. The Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Standards will continue to improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and non-residential buildings. The

effective date of the 2019 Standards is January 1, 2020.[23] The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue the California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

Existing Infrastructure

The Project Site is located in a highly urbanized area in the City of Los Angeles. The surrounding area is adequately served with roads, sidewalks, and by overhead utilities. Since the Proposed Project would replace the existing commercial uses on the Project Site, the Proposed Project would generate an increase in energy consumption as compared to existing conditions. The analysis below focuses on the change between the existing baseline condition and the condition with the construction and operation of the Proposed Project.

Electricity

The Project Site is located in a highly urbanized area in the West Los Angeles community. Based on observation, there are overhead circuit lines along Beverly Drive and the adjacent alleyway. The Proposed Project would require on-site transformers and may require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project Site vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account by SCG in the planned growth of the natural gas system.

Natural Gas

Southern California Gas Company (SCG) provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SCG's policies and extension rules on file with the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through

[23] *California Energy Commission, 2019 Building Energy Efficiency Standards, website: https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf, accessed March 2020.*

natural gas facilities underneath the adjacent public streets. Construction of the Proposed Project would necessitate closing off existing service connections to the Project Site and re-establishing new service connections to the proposed structure. Such infrastructure improvements would be conducted on-site and within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be localized to the portion of the Project Site proposed to be developed, and (c) any foreseeable off-site improvements would be limited to the right-of-way easements in the immediate Project Site vicinity. Therefore, potential impacts resulting from natural gas infrastructure improvements would be less than significant.

Energy Consumption

Construction

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. In order to quantify the amount of diesel and gasoline fuel utilized for the Proposed Project's construction, the equipment usage, horsepower, load factors, and fuel rates from the construction phases and activities calculated in the CalEEMod worksheets for the Proposed Project were utilized to estimate the gallons of diesel and gasoline consumed (Appendix B, Energy Consumption Worksheets). Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. Construction of the Proposed Project would require the export of asphalt and building debris from the portion of the Project Site proposed to be developed during the demolition and site clearing phases. Additionally, up to 21,040 cubic yards of soil would be exported as a result of the grading for the subterranean levels. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period.

The total electricity, gasoline and diesel fuel anticipated to be used during construction is summarized in Table 4.5, Summary of Energy Usage During Construction, below. As shown, construction of the Proposed Project would consume approximately 1,169 kWh of electricity, approximately 56,872 gallons of diesel fuel, and 19,597 gallons of gasoline during construction.[24]

[24] *Refer to Energy Consumption Worksheets included as Appendix B in this IS/ND.*

Table 4.5
Summary of Energy Use During Construction

Fuel Type	Quantity
Electricity	1,163 kWh [a]
Gasoline	19,597 gallons
Diesel	56,872 gallons

Notes:
[a] *kWh = Kilowatt-hour*
Source: Parker Environmental Consultants, 2020.
Calculation worksheets are provided in Appendix B to this IS/ND.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient, or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Proposed Project or used during the operational life of the Proposed Project, or the end of life for the materials and processes that would occur as an indirect result of the Proposed Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Operation

Electricity

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The *L.A. Green Building Code* imposes energy conservation measures for all new projects to further reduce energy demands within new buildings. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24

of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in water demand. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the development. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. In total, LADWP operates 21 receiving stations and 162 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 29% from renewable energy sources, 34% from natural gas, 9% from nuclear, 3% from large hydro, 19% from coal, and 6% from other and unspecified sources. The estimated power requirements for the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP power system set its all-time high peak at 6,432 MW on August 31, 2017, a 1-in-12.6 weather event.[25]

The Proposed Project's electricity demands shown in Table 4.6 are estimated based on the calculated electricity usage provided in SCAQMD's CalEEMOD. As shown in Table 4.6, below, the estimated increase in electricity consumption by the Proposed Project would be approximately 579,386 kWh per year. Implementation of code compliance measures would ensure the Proposed Project meets and exceeds the minimum Title 24 energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, LADWP would confirm the availability of electric service connections for the Proposed Project. Therefore, the development of the Proposed Project would not cause wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas

Gas supply available to SCG from California sources averaged 323 million cubic feet (cf)/day in 2017. SCG projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) 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 the natural gas consumption becoming more efficient and decreasing, the SCG's projection for

[25] *LADWP, 2017 Retail Electric Sales and Demand Forecast. http://ezweb.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast_Final.pdf, accessed August 2019.*

Table 4.6
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Total Electricity Demand (kWh/year) [a]
Existing Uses		
General Office	7,236 sf	110,227
Car Wash	7,247 sf	90,877
Total Existing Electricity Demand:		***201,104***
Proposed Uses		
Multi-Family Residential	108 du	408,374
Restaurant	1,000 sf	43,021
Retail	2,250 sf	28,758
Parking, Utilities, Storage	52,595 sf	287,332
EV-Charging Stations [b]	15 spaces	13,005
Total Proposed Project Electricity Demand:		***780,490***
Existing Electricity Demand (to be demolished):		*(201,104)*
NET TOTAL Electricity Demand:		**579,386**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix D to this IS/ND.*
[b] *Fifteen (15) spaces would be EV-ready. It is estimated that one Level 1 charging station consumes 867 kWh/year of electricity for drivers who commute average 10 miles one way. Source: U.S. Department of Energy, Level 1 Electric Vehicle Charging Stations at the Workplace, page 8, July 2016.*
Source: Parker Environmental Consultants, 2020.

natural gas also decreases. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG's estimated physical capacity of upstream pipelines. SCG's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 112.5 billion cubic feet is allocated to residential, small industrial and commercial customers.[26] As shown in Table 4.7, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 940,824 cubic feet per year, would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018.

[26] *California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, accessed July 2020.*

Table 4.7
Estimated Natural Gas Consumption by the Proposed Project

Land Use	Size	Total Natural Gas Demand (kBTU/yr) [a]	Total Natural Gas Demand (cf/yr) [b]
Existing Uses			
General Office	7,236 sf	90,016	88,216
Car Wash	7,247 sf	143,491	140,621
Total Existing Natural Gas Demand:		***233,507***	***228,837***
Proposed Project			
Multi-family Residential	108 du	962,272	943,027
Restaurant	1,000 sf	227,751	223,196
Retail	2,250 sf	3,509	3,439
Total Proposed Project Natural Gas Demand:		**1,193,532**	**1,169,661**
Less Existing Natural Gas Demand:		*(233,507)*	*(228,837)*
NET TOTAL Natural Gas Demand:		**960,025**	**940,824**

Notes: sf =square feet; du = dwelling unit
[a] SCAQMD, CalEEMod Version 2016.3.2, See Appendix D, Greenhouse Gas Worksheets.
[b] 1kBTU is equivalent to 0.98 cubic feet of natural gas.
Source: Parker Environmental Consultants, 2020.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. The cool roof standards and water conservation features would further reduce demands upon building heating and cooling. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of natural gas.

Fossil Fuels

Operation of the Proposed Project would generate vehicle trips associated with people driving to the Project Site for work, home, or commercial purposes; and driving to and from work and other destinations throughout the region. Based on the trip generation rates provided in the Project Trip Generation Assessment, and the vehicle trip lengths calculated in the CalEEMod air quality worksheets, it is estimated that operation of the Proposed Project would result in a net decrease of approximately 135,474 annual vehicle miles traveled on an annual basis.[27] The Proposed Project would include several conservation measures to decrease reliance on fossil

[27] *See CalEEMod Worksheets included as Appendix A to this IS/ND.*

fuels, including coal, natural gas and oil. Further, the Project Site is located in the West Los Angeles area, which is highly connected to the regional transit network in the Los Angeles area. Public transportation within the vicinity of the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities. In the vicinity of the Project Site, bus stops are primarily located along Pico Boulevard and Beverly Drive. Bus lines that operate in the Project Site area include, but are not limited to, Metro lines: 14 and Santa Monica BBB Line 7 and Rapid 7. These bus lines provide access to other bus lines that connect to other parts of the City and to the greater Los Angeles metropolitan area.

The Proposed Project is an infill development and would construct a mixed-use residential and commercial building. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some employees and patrons would take transit to their destinations, or would walk to destinations nearby. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. As discussed in the Trip Generation Assessment (see Appendix G of this IS/ND), a reduction of 10 percent for transit utilization/walk-ins was applied for the trips generated by the proposed residential and commercial uses and a 20 percent reduction for pass-by trips was applied for the commercial uses (which are all already factored into the fuel use estimates above). The reduction in vehicle trips would decrease the Proposed Project's reliance on fossil fuels. Furthermore, because the Proposed Project would replace an existing car wash, which is characterized with high mobile trips, the Proposed Project would result in a net decrease in operational fuel usage of 4,492 gallons of gasoline and 1,297 gallons of diesel fuel per year, as shown in Table 4.8, below. This estimate would be further reduced with the promotion of electric vehicle supply equipment (EVSE) on-site. Pursuant to LAMC 99.04.106.4.4, a minimum of 30 percent of the total code required parking is required to be capable of supporting future EVSE, and at least 10 percent of the total code required parking spaces are required to include electric vehicle charging stations (EVCS). The provision of EVSE and EVCS infrastructure would further serve to promote the utilization of alternative fueled vehicles thus reducing the combustion of fossil fuels. Based on these factors, the Proposed Project's vehicle trips would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and would serve to promote reliance on renewable energy sources. As such, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of fossil fuels and would promote walking, biking, and other modes of public transportation.

As discussed in the preceding paragraphs, the Proposed Project would not result in wasteful, inefficient or unnecessary consumption of electricity, natural gas, or transportation energy during construction and operation. Therefore, impacts to energy resources would be less than significant.

Table 4.8
Estimated Transportation Energy Consumption by the Proposed Project

	Annual VMTs (miles) [a]	Fuel Rate (mpg) [b]	Total Fuel Demand (gallons/year)
Diesel			
Existing (to be demolished)	130,127	6.27	(20,754)
Proposed Project	121,998	6.27	19,457
		Net Diesel Consumption:	***(1,297)***
Gasoline			
Existing (to be demolished)	2,038,651	28.35	(71,910)
Proposed Project	1,911,306	28.35	67,418
		Net Gasoline Consumption:	***(4,492)***

Notes: VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *Appendix D, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.*
[b] *Source: Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008)*
Parker Environmental Consultants, 2020.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. A significant impact could occur if the Proposed Project has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to renewable energy, all of the proposed Project's energy demands will be served by the City of Los Angeles Department of Water and Power (LADWP). Starting in 2017, the City's Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Proposed Project would be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the Proposed Project will comply with the L.A. Green Building Code requirement that projects comply with the following requirements related to water efficiency, solid waste reduction, and electric vehicle supply equipment:

> Solid Waste Reduction. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.
>
> Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.
>
> Electric Vehicle Supply Equipment. The Proposed Project would provide electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE), and at least 10 percent of the total parking spaces would include electric vehicle charging stations (EVCS). The incorporation of EVSE and EVCS into the Proposed Project is consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips and VMTs generated by the Project.

On a project specific level, the Proposed Project includes the following features, which will further reduce energy demands:

1. *Proximity to mass transit:* The Project Site is an infill site and is also located within ½ mile of bus routes with peak commute service intervals of 15 minutes or less.

2. *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a car wash, food stand, and office building, which is located in a highly developed area of Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

3. *Trip Reduction:* The Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 185,480). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 10 short-term bicycle parking spaces and 81 long-term bicycle parking spaces. The Proposed Project would provide 10 short-term bicycle parking spaces and 81 long-term bicycle parking spaces, for a total of 91 bicycle parking spaces.

4. *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2019 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed residential dwelling units such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy. The Proposed Project would be required to comply with the 2019 CALGreen Code, 2019 Title 24 standards, and the L.A. Green Building Code standards. Compliance with state and local energy efficiency standards would ensure the Proposed Project meets all applicable energy conservation policies and regulations. As such, the Proposed Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects within the City of Los Angeles would further increase demand for electricity, natural gas, and fossil fuels.

Electricity

The Proposed Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles 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. Therefore, 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 of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

Natural Gas

Development of the Proposed Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, the SCG allocated approximately 112.5 billion cubic feet to residential, small industrial and commercial customers. As a public utility provider, the SCG 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. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SCG's ability to serve each related project. As such, it is anticipated the related projects and the Proposed Project would be accommodated by SCG. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Fossil Fuels

The Proposed Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration (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. Additionally, a majority of the related projects are also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. As such, the Proposed Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.

VII. Geology and Soils

The following section summarizes and incorporates by reference information from the Geotechnical Investigation, Proposed Five-Story Building Over Three Subterranean Levels, 9500-9530 W. Pico Boulevard, Los Angeles, CA 90035, prepared by Feffer Geological Consulting, Inc., dated December 6, 2018 ("Geotechnical Investigation"). The Geotechnical Investigation is included as Appendix C to this IS/ND.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

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.

Less Than Significant Impact. A significant impact may occur if a Proposed Project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Geotechnical Investigation concluded that the Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the Proposed Project is considered low. The closest known potentially active fault to the Project Site is the Santa Monica-Hollywood Fault Zones, located within 1.1 and 0.6 miles to the north and east respectively; and the Newport Inglewood Fault located 0.5 mile to the west. Since no active faults cross the Project Site, the surface rupture hazard at the Project Site is very low.

A risk common to all areas of Southern California that should not be overlooked is the potential for damage resulting from seismic events (earthquakes). The Project Site is located within a seismically active area, as is all of Southern California. Although there are no active faults on or

within the immediate vicinity of the Project Site, earthquakes generated on large regional faults such as the San Andreas Fault could affect the Project Site.

The Project Site is within an area including completed housing and building developments. Geotechnical exploration, analyses, experience, and judgment result in the conclusion that the Proposed Project is suitable from a geotechnical standpoint. Additionally, the Project Site can be improved without hazard of landslide, slippage, or settlement, and improvement can occur without similar adverse impact on adjoining properties. Realizing this expectation would require adherence to good construction practice, agency and code requirements, the recommendations in the Geotechnical Investigation, and possible addendum recommendations made after plan review and at the time of construction. It should be realized that the purpose of the seismic design utilizing the above parameters is to safeguard against major structural failures and loss of life, but not to prevent damage altogether. Even if the structural engineer provides designs in accordance with the applicable codes for seismic design, the possibility of damage cannot be ruled out if moderate to strong shaking occurs as a result of a large earthquake. This is the case for essentially all structures in Southern California.

Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that the Proposed Project meets the applicable performance measures. Accordingly, with the design and construction of the Proposed Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, impacts associated with seismic hazards would be less than significant. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, Proposed Project impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area. However, the nearest earthquake faults are the Santa Monica-Hollywood Fault Zones, located within 1.1 and 0.6 miles to the north and east respectively; and the Newport Inglewood Fault located 0.5 mile to the west. Therefore, the Project Site is located within a seismically active area, as is all of Southern California. Although there are no active faults on or within the immediate vicinity of the Project Site, earthquakes generated on large regional faults could affect the Project Site.

The Project Site is within an area including completed housing and building developments. Geotechnical exploration, analyses, experience, and judgment result in the conclusion that the Proposed Project is suitable from a geotechnical standpoint. Additionally, the Project Site can be improved without hazard of landslide, slippage, or settlement, and improvement can occur without similar adverse impact on adjoining properties. Realizing this expectation would require adherence to good construction practice, agency and code requirements, the recommendations in the Geotechnical Investigation, and possible addendum recommendations made after plan review and at the time of construction. It should be realized that the purpose of the seismic design utilizing the above parameters is to safeguard against major structural failures and loss of life, but not to prevent damage altogether. Even if the structural engineer provides designs in accordance with the applicable codes for seismic design, the possibility of damage cannot be ruled out if moderate to strong shaking occurs as a result of a large earthquake. This is the case for essentially all structures in Southern California.

The Geotechnical Investigation concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and implemented during design and construction. Additionally, the Proposed Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter would be implemented for the Proposed Project, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. Therefore, Proposed Project impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The Project Site is located in an area identified as not having a potential for liquefaction on the "State of California Seismic Hazard Zones Map for the Beverly Hills Quadrangle". Additionally, according to the County of Los Angeles Seismic Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Historically, highest groundwater in this area of Los Angeles is estimated to be more than 40 feet below the ground surface.

The Project Site is considered to be suitable for the proposed construction from a geotechnical engineering standpoint, provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. The Proposed Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. Therefore, with compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.

iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. As concluded in the Geotechnical Investigation, the topography at the Project Site is relatively level and the topography in the immediate vicinity slopes gently to the south-southwest. The Project Site is not located within a City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for slope instability according to the County of Los Angeles Safety Element. Furthermore, the Project Site and project area is not within an area identified as having a potential for seismic slope instability as designated by the "State of California Seismic Hazard Zones" map. The Geotechnical Investigation stated there are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. As such, the potential for slope stability hazards to adversely affect the Proposed Project is considered low. Therefore, no impact would occur.

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles though grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that Project Site would be mostly paved-over or built upon so little soil would be exposed. The Project Site would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shoring during construction of the Proposed Project. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the conditions included in City of Los Angeles Department of Building and Safety's Soils Report Approval Letter, impacts associated with soil erosion and loss of topsoil would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the general lack of elevation difference across or adjacent to the Project Site. With the implementation of Building Code requirements as discussed above in Checklist Question VII (a), the potential for geologic hazards would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper foundation design features, heaving and cracking of both building foundations and slabs-on-grade could result. The Geotechnical Investigation found that the on-site near surface soil was found to possess medium to high expansive characteristics based upon field soil classifications. However, proper soil compaction and fill activities detailed in the Geotechnical Investigation would be incorporated into the building foundations and design. Thus, with incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the Building Code requirements, a less than significant impact would occur related to expansive soil.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative

wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

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

Less Than Significant. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and is currently developed with a car wash, food stand, and office building. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.[28]

This is further supported by correspondence received from the Natural History Museum of Los Angeles County dated September 19, 2019 (contained in Appendix H.2), which states that no vertebrate fossil localities lie directly within the Project Site boundaries, but nearby localities from the same sedimentary deposits occur at depth in the proposed Project Site area.

In the entire Project Site area, there are older Quaternary deposits that are nominally marine, possibly referred to the San Pedro Sand. The closest vertebrate fossil locality in older Quaternary sediments is LACM 5501, just north of due west of the Project Site area south of Olympic Boulevard between Avenue of the Stars and Century Park East, that produced fossil specimens of pond turtle, *Clemmys marmorata*, dog, *Canis*, and horse, *Equus*, at shallow but unstated depth. Near the intersection of Wilshire Boulevard and Bedford Drive, further north-northwest of the Project Site, the localities LACM 3355 and 3821 produced specimens of fossil horse, *Equus*, and even-toed ungulates, *Artiodactyla*, at a depth of 40 feet below the surface. The locality LACM 5833, west-northwest of the Project Site, south of Wilshire Boulevard between Thayer and Westholme Avenues, produced fossils of horse, *Equus*, kangaroo rat, *Dipodomys*, wood rat, *Neotoma*, meadow vole, *Microtus*, and pocket gopher, *Thomomys*, at shallow but unstated depth.

East-northeast of the Project Site, north of Olympic Boulevard just east of Schumacher Drive, the vertebrate fossil locality LACM 3329 produced fossil specimens of bison, *Bison*, and horse, *Equus*, at a depth of 16 feet below street level during excavation for the North Outfall Sewer. A little further east along Olympic Boulevard near Alvira Street, the vertebrate fossil locality LACM 1238 produced a fossil specimen of mammoth, *Mammuthus*, at a depth of 13 feet below the

[28] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

surface during excavations for flood control. The older Quaternary localities LACM 7669 and LACM 7670, slightly further east-northeast of the Project Site along San Vicente Boulevard near the intersections with Wilshire Boulevard and Orange Street respectively, produced fossil specimens of ground sloth, *Xenarthra*, elephantoid, *Proboscidea*, and bison, *Bison*, at unstated depth during excavations for the Hollyhills Drain. Just to the west of these latter localities, at the intersection of La Cienga Boulevard and Wilshire Boulevard, the older Quaternary locality LACM 3176 produced fossil specimens of bison, *Bison*, at a depth of 30 feet below the surface. A little further north, to the northeast of the proposed project area along San Vicente Boulevard between Colgate Avenue and Drexel Avenues, the older Quaternary locality LACM 7671 produced fossil specimens of mastodon, *Mammut*. Further along San Vicente Boulevard, near the intersection with 3rd Street, the older Quaternary locality LACM 7672 produced fossil specimens of deer, *Cervidae*, and elephantoid, *Proboscidea*, at unstated depth in excavations for the Hollyhills Drain.

Any excavations in the older Quaternary deposits exposed throughout the Proposed Project area may well encounter significant vertebrate fossil remains. Any substantial excavations in the Project Site, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the Proposed Project area. Any fossils recovered should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

As mentioned above, although no paleontological resources are known to exist on-site, there remains a low potential for unknown paleontological resources to be uncovered during the construction of the mixed-use building with up to two levels of subterranean parking. Because the presence of absence of such materials cannot be determined until the Project Site is graded, the City's standard condition of approval for addressing inadvertent discoveries shall be incorporated into the Proposed Project's approval. The City's standard condition of approval requires that upon any discovery of a potential paleontological resource, the Applicant shall immediately notify the Los Angeles Department of Building and Safety and stop all ground disturbing activities in the area of the discovery until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. Therefore, with the implementation of the City's standard conditions of approval for addressing inadvertent discoveries of paleontological resources, potential impacts to paleontological resources encountered at the Project Site would be less than significant without mitigation.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance

measures and standard conditions of approval recommended above, Proposed Project impacts would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts 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?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF_3), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California Global Warming Solutions Act of 2006

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

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG

emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[29] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[30] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving

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[29] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

[30] *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2050, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Additionally, SB 32 established a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential uses and does not propose any industrial or high-emitting land uses.

On July 11, 2018, CARB recently announced that greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal set by AB 32.[31]

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State-mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water

[31] *California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed August 2019.*

efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis.

City of Los Angeles Sustainable City pLAn / L.A.'s Green New Deal

On April 8, 2015, Mayor Eric Garcetti released Los Angeles' first ever Sustainable City pLAn (The pLAn). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short term (by 2017) and long term (2025 and 2035) targets. The pLAn set out an ambitious vision for cutting GHG emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and GHG accounting. Los Angeles has already reduced its GHG emissions by 20 percent below 1990 levels as of 2013, nearly halfway to the goal of 45 percent below 1990 levels by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

In 2019, the Mayor's office updated the Sustainable City pLAn with the adoption of The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal), which establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation. L.A.'s Green New Deal reported that in 2017 approximately 30% of the LADWP's total energy production was from renewable energy sources.[32] The Sustainable City pLAn / L.A.'s Green New Deal is guided by four key principles: (i) to uphold the Paris Climate Agreement; (ii) to deliver environmental justice and equity through an inclusive green economy; (iii) to ensure every Angeleno has the ability to join the green economy by creating pipelines to good paying, green jobs; and (iv) to lead by example within City government.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent

[32] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City Plan, 2019.*

with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 5.303.2.2 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. Projects filed on or after January 1, 2020 must comply with the provisions of the Los Angeles Green Building Code. New development projects are required to comply with the *L.A. Green Building Code.* Therefore the Project would comply with an adopted plan or regulation that was adopted in part for the purposes of reducing GHG emissions.

Connect SoCal (2020 RTP/SCS)

On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. On October 30, 2020, through Executive Order G-20-239, CARB accepted SCAG's 2020 RTP/SCS as a GHG reduction plan.[33]

Connect SoCal 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. Connect SoCal 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. Within the Connect SoCal Plan, the 2020 SCS would, when implemented, meet the applicable 2035 GHG emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels. CARB staff's determination summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions'

[33] *State of California, Air Resources Board, Executive Order G-20-239, website: https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689, accessed December 2020.*

land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

SCAQMD

In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. However, this group has not met since 2010.

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

Less Than Significant Impact. Neither the City, SCAQMD, nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use residential and commercial project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project". The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination. A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce

GHGs; (2) whether the GHG 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, local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court's decision published on November 30, 2015, in the Center for Biological Diversity v. California Department of Fish and Wildlife (62 Cal.4th 204) (also known as the Newhall Ranch Case) reviewed the methodology used to analyze GHG emissions in CEQA. The California Supreme Court suggested regulatory consistency as one pathway to compliance, by stating that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court stated that a lead agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, including statewide programs and local climate action plans or GHG emissions reduction plans. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested: "A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions" (bright line threshold approach) if supported by substantial evidence."

For the Proposed 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 help address climate change (see discussions above), 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 Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) 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. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020 Connect SoCal plan, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by the 2017 Scoping Plan and subsequent updates SB 375, SCAG's 2020 Connect SoCal, and the L.A. Green Building Code.

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 4.9, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 4.9, the total GHG emissions from construction activities related to the Proposed Project would be approximately 972 metric tons, with the greatest annual emissions occurring in 2021.

Table 4.9
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2021	588
2022	384
Total Construction GHG Emissions	**972**

[a] *Construction CO_2 values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix D, Greenhouse Gas Emissions Worksheets.*

As impacts from construction activities occur over a relatively short-term period of time and involve a limited use of combustion-driven construction equipment, they contribute a relatively small portion of the overall lifetime project GHG emissions. Consistent with the SCAQMD's recommendation for addressing construction impacts for stationary sources in which the SCAQMD is the lead agency, the construction emissions for this Project have been amortized over a 30-year project lifetime, so that GHG emissions from construction activities can be factored into the Project's overall GHG impact.[34] Therefore, total construction GHG emissions were divided by 30 to determine the average annual construction emissions over the life of the Project.

Operation

Baseline GHG Emissions

The Project Site is currently developed with a car wash, food stand, and office building, which serves as the existing conditions baseline. The operations of commercial uses generate GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 4.10, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing commercial and office uses at the Project Site. As shown in Table 4.10, the existing operations on the Project Site generate approximately 1,140.01 CO^2e MTY.

[34] *SCAQMD Governing Board Agenda Item 31, December 5, 2008.*

Table 4.10
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	<0.01
Energy	124.80
Mobile	973.43
Waste	17.31
Water	24.47
Total	**1,140.01**
Greenhouse gas emissions were estimated using CalEEMod Version 2016.3.2 Calculation data and results provided in Appendix D to this IS/ND.	

Proposed Project GHG Emissions

The Proposed Project would result in the development of a mixed-use residential and commercial building with 108 dwelling units and 3,250 square feet of commercial space. The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated in compliance with the Title 24 Standards, *L.A. Green Building Code,* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. As shown in Table 4.11, below, the net increase in GHG emissions generated by the Proposed Project would result in 1,458.27 CO_2e MTY.

For purposes of this comparison it should be noted that the Proposed Project's structural and operational features such as installing energy efficient lighting, low flow plumbing fixtures, and implementing an operational recycling program during the life of the Proposed Project would reduce the Proposed Project's GHG emissions. When considering the fact that the Proposed Project is an infill development and is recycling land and reutilizing existing infrastructure, which is encouraged through the state, regional and local plans and policies (i.e., AB32, SB375, and SCAG's 2020 Connect SoCal growth strategy), the Proposed Project's net GHG emissions would equal 318.26 CO_2e MTY, which would be well below the SCAQMD proposed non-industrial screening threshold of 3,000 $MTCO_2e$/year. While neither SCAQMD nor the City have adopted this screening threshold, the fact the Proposed Project's GHG emissions are below the threshold provides further substantial evidence that the Proposed Project's GHG impacts are less than significant.

Through required implementation of the Green Building Code, the Project Site's location on an infill site, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's SB 32 Scoping Plan aimed at achieving a 40 percent reduction of 1990 GHG emission levels by 2030. The following describes the benefits and applicability of the Proposed Project's compliance measures and design features that serve to reduce the carbon footprint of the development:

Table 4.11
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
	Proposed Project
Area	1.87
Energy	492.96
Mobile	844.04
Stationary	4.59
Waste	7.99
Water	74.42
Construction Emissions [a]	32.40
Subtotal GHG Emissions:	***1,458.27***
Less Existing GHG Emissions:	*(1,140.01)*
Net Total Existing GHG Emissions:	**318.26**

Notes:
[a] *Pursuant to SCAQMD guidance recommended in the SCAQMD GHG Working Group meeting on November 19, 2009, the total construction GHG emissions were amortized (i.e., averaged annually) over 30 years and added to the operation of the Project.*
Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Worksheets.

Infill Development. The Proposed Project is located on an infill site that is currently developed with commercial and office uses. The Proposed Project would include the demolition of the existing structures, which would result in a reduction in existing GHG emissions which would offset the new GHG emissions generated by the Proposed Project. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

Location Near Major Transit Stops. The Project Site is located within ¼-mile of a major transit stop along Beverly Drive, with 15 minute or less headways during peak hours. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency 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. The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone mixed-use projects that are not located in close proximity to transit.

Energy Conservation. The Proposed Project would include the development of a mixed-use building with 108 dwelling units, 3,250 square feet of commercial space, and

50,000 gross square feet or more of floor area. As mandated by the L.A. Green Building Code, the Proposed Project must meet Title 24 2019 standards and include ENERGY-STAR appliances. The Proposed Project would provide electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE), and at least 10 percent of the total parking spaces would include electric vehicle charging stations (EVCS).

Solid Waste Reduction Efforts. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 70 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

In addition to the GHG emission reductions described above, it is important to note that the CO_2e estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing environment. This is a standard approach taken for air quality and greenhouse gas emissions analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the South Coast Air Basin and are new emissions sources, or whether they are sources that were already occurring within the Basin and merely shifted to a new location. Because the effects of GHGs are global in nature, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little

change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

Plan Consistency

Consistency with SB 32 Scoping Plan

While the Scoping Plan provided several board goals and policies aimed at reducing greenhouse gasses on a statewide level, some of the policies are applicable or interrelated to the development of specific land use projects at the local level. Provided below is a consistency analysis of the Scoping Plan's policies that are applicable or indirectly applicable to the Proposed Project.

Energy Efficiency. The Proposed Project would be consistent with the Scoping Plan's policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, low-flow plumbing fixtures, and ENERGY STAR-rated appliances.

Renewables Portfolio Standard. The Proposed Project would not impede the Scoping Plan's policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy to 35%.

Green Building Strategy. The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low-flow plumbing fixtures, and ENERGY STAR-rated appliances.

Recycling and Waste. The Proposed Project would be consistent with the Scoping Plan's policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity. (see response to Checklist Question XIX, below). It would meet the City's 70 percent waste diversion rate goal and comply with the City's Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.

Water. The Proposed Project would be consistent with the Scoping Plan's policy to continue efficiency programs and use cleaner energy sources to move and treat water. The Proposed Project would use water-efficient low-flow plumbing fixtures that would reduce the demand for potable water on site. As such, the Proposed Project's conservation efforts would be achieved by complying with the Green Building Code and would further reduce the demands for treating potable water and wastewater.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be 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 the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS is provided further below.

Consistency with 2020 Connect SoCal

The Proposed Project would be consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020 RTP/SCS), which are based on changing the region's land use and travel patterns:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations
- Support implementation of sustainability policies; and
- Promote a green region.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial uses within a High Quality Transit Area (HQTA). The Proposed Project would provide residents, employees, and patrons with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures such as the Project's TDM Program would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal.

Consistency with L.A. Green Building Code

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, provide on-site

storage for short- and long-term bicycle parking areas, and provide ENERGY STAR-rated appliances were applicable. A minimum of 30 percent of the total code required parking is required to be capable of supporting future EVSE, and at least 10 percent of the total code required parking spaces are required to include EVCS. The provision of EVSE and EVCS infrastructure would further serve to promote the utilization of alternative fueled vehicles thus reducing the combustion of fossil fuels. The Project would comply with these mandatory measures. Therefore, the Project is consistent with the L.A. Green Building Code.

As demonstrated above, the Proposed Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

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

Less Than Significant Impact. As described above and in response to Checklist Question VIII(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030 and 80 percent below 1990 levels by 2050. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Pursuant to the Office of Planning and Research's recently published Discussion Draft on CEQA and Climate Change (December 2018), in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of a project's emissions to the effects of climate change. It is the increased accumulation of GHG emissions from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on climate change. As concluded above, the Proposed Project's

generation of GHG emissions would offset the removal of existing GHGs from the existing land uses and would incorporate GHG reduction measures in compliance with all applicable plans, policies, and regulations for the purposes of reducing GHG emissions. The Proposed Project represents an infill development which supports the goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, SCAG's Connect SoCal, and CARB's 2017 Scoping Plan. As such, the Proposed Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Therefore, similar related projects would be required to comply with all local ordinances, regulations, and policies that reduce GHG emissions and would not have a significant cumulative impact from GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts 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?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following section summarizes and incorporates by reference information from the following technical reports:

- Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, Century West Car Wash, 9500 West Pico Boulevard, Los Angeles, CA 90035, , January 18, 2017 ("Phase I ESA") (see Appendix E.1 to this IS/ND);
- Apex Companies, LLC, Path to Closure Narrative, Century West Car Wash, 9500 W. Pico Boulevard, Los Angeles, CA 90035, LARWQCB#900640107, March 25, 2021 (see Appendix E.2 to this IS/ND),
- Brownfield Subslab, Subsurface Methane Investigation for 9500-9530 W. Pico Boulevard, Los Angeles, CA 90035, March 3, 2020 ("Methane Investigation") (see Appendix I to this IS/ND), and
- Ardent Environmental Group, Inc., Qualitative Health Risk Assessment, 9500 Pico Boulevard, Los Angeles, California, March 25, 2021.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a six-story mixed-use building with a total of 108 dwelling units and 3,250 square feet of commercial space. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained,

stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

Project Site Description

The Project Site is currently occupied by Century West Car Wash for commercial use. On-site operations consist of car washes with limited detailing services and administrative office activities. In addition to the current structures, the car wash property is also improved with asphalt and concrete paved parking and drive areas. No undeveloped or landscaped areas are located on the car wash property. Other than biodegradable soaps and waxes, no significant quantities of hazardous materials are stored on-site.

Records Search/Review

According to available historical sources, the car wash property was formerly vacant land as early as 1923 through 1937 and was developed with a gasoline service station on the northeast corner with retail stores on the western portion of the property from circa 1935 to 1953. In 1953, the service station was demolished and this area of the car wash property was redeveloped with a car wash; retail uses continued on the western portion of the property. In 1964, the entire property was razed and redeveloped with the current improvements in 1965 for use as a car wash facility. Tenants on the car wash property have included a service station (1935 to 1953); Beverlywood Car Wash (1953 to 1964); retail tenants including real estate office, restaurants, beauty salon, and hand laundry (c. 1948 to 1964); Orange Julius (1970 to 1985); and Beverlywood/Century West Car Wash (1965 to present).

The car wash property was identified as an underground storage tank (UST), leaking UST (LUST), Enforcement Action Listing (ENF), Historic Hazardous Waste & Substances Site (Hist Cortese), Facility and Manifest Data (HAZNET) and EDR Historic Auto Station site in the regulatory database report. In 1994, two 10,000-gallon gasoline and one 550-gallon waste oil tank were removed from the site. Results of soil samples collected from beneath the former USTs and associated dispenser islands showed hydrocarbon concentrations in excess of Los Angeles Fire Department (LAFD) action levels. Additional delineation assessments conducted between 1995 and 1998 confirmed that soil and groundwater beneath the former USTs and dispenser islands were impacted with TPHg, benzene, toluene, ethylbenzene, and xylenes (BTEX), and MtBE. Due to the presence of hydrocarbon-impacted groundwater beneath the site, the LAFD transferred the case to the LARWQCB in 1997. The Project Site has been subject to corrective action remediation activities under the oversight and direction of the LARWQCB since 1997 (LARWQCB Case No. 900640107). The following provides a summary of the remediation and monitoring activities under LARWQCB Case No. 900640107:

- ***Groundwater***

  Groundwater monitoring has occurred on the Project Site since 1998; a total of 12 monitoring wells were installed on the car wash property, with two additional wells located in the public right of way in Beverly Drive. In September 2013, a request was made to the LARWQCB to destroy the 12 on-site monitoring wells based on October 23, 2013 sampling results which revealed non-detect or trace concentrations of petroleum hydrocarbons; it was determined that the up-gradient portion of the plume could be actively monitored by the off-site wells located in Beverly Drive. These 12 on-site wells were subsequently destroyed in April 2014. Groundwater monitoring of the remaining wells has continued on a semi-annual basis with the last round of groundwater sampling occurring on September 15, 2016. According to the Second Half 2020 Semi-Annual Monitoring and Remediation Status Report, dated January 15, 2021, for the car wash property, the LARWQCB determined that the petroleum hydrocarbon plume at the Project Site had migrated downgradient and has comingled with that of the ExxonMobil property located adjacent to the east, across Beverly Drive. Contaminant concentrations in the wells in Beverly Drive appear to be significantly associated with the release of gasoline from the adjoining ExxonMobil station. However, the LARWQCB has required that the comingled plume be addressed by the responsible parties in a joint Remedial Action Plan (RAP). Remediation efforts with the off-site comingled plume remain an active open case and will continue under the direction and oversight of the LARWQCB. As required by the LARWQCB's closure directive, pending ExxonMobil cleanup of their vadose zone impacts (i.e. to the extent practicable), the Applicant will resume the RAP development discussions with ExxonMobil and implement a plan to reduce comingled groundwater impacts beneath and downgradient of the Mobil 18FOM station to levels that meet LTCP criteria for "groundwater" closure. As all of the groundwater monitoring wells and remediation efforts occur downgradient of the Project Site and do not occur on or beneath the Project Site, development of the Project Site would not impede future remediation efforts or exacerbate environmental conditions associated with

contaminated groundwater. Impacts related to groundwater would therefore be less than significant.

- ***Soil Vapor***

  In April 2001, a soil vapor extraction (SVE) system began operating on the Project Site in response to the identification of contaminated soils. The SVE system was operational through March 18, 2004. A total of 64,759 pounds of total petroleum hydrocarbons were removed from the Project Site during this time. Post-shutdown confirmation soil sampling was completed in August 2004 and the LARWQCB indicated that no further remediation was necessary at that time. However, in order to obtain approval to remove the SVE system, an additional soil confirmation boring was required. Results of the soil confirmation boring were submitted in July 2008, and the LARWQCB issued a No Further Action letter for soil remediation on September 17, 2008.

  Although the LARWQCB has issued a No Further Action letter for contaminated soils, such closure letter is conditioned on the present commercial land uses and soil conditions and does not apply to the proposed development. As noted in the path to Closure Narrative provided in Appendix E.2 to this IS/ND, a closure evaluation for the project Site under the SWRCB Low-Threat Underground Storage Tank Case Closure Policy was performed in November 2020 by the LARWQCB and posted on the State's GeoTracker website (see Attachment A in Appendix E.2 for pertinent agency correspondence). The Proposed Project would involve excavating the Project Site to allow for the construction of a two level below grade parking structure and the construction of 108 multi-family residential uses in a six story building. Accordingly, the LARWQCB has indicated that due to the planned site redevelopment/land use change from commercial to residential, "a soil vapor assessment needs to be completed at the [Project Site] to determine the risk of vapor intrusion into the proposed future building at the Site" and "CWCW is required to submit a soil vapor assessment work pan for the installation of soil vapor probes and collection of soil vapor samples at the Site."

  To meet the LARWQCB requirement, soil gas sampling is planned to be completed after site excavation to determine baseline conditions. The concentrations will be presented to the LARWQCB, along with a detailed description of the soil gas depressurization and parking structure ventilation systems, and a recommendation for no further work. To fulfill the LADBS requirements, the proposed building will be constructed with an active methane vapor ventilation system. This system will include an impermeable vapor barrier beneath the subterranean parking structure to prevent methane gas from migrating into the site building. Below the vapor barrier, perforated horizontal pipes will be set midway within an 8-inch bed of gravel. A blower will be installed to provide a depressurization system beneath the building pad to evacuate air from the gravel zone and horizontal pipes at a rate of at least three volumes per hour. The evacuated air will be conveyed by piping to ventilation ports at the top of the building.

In addition, the subterranean parking structure will be constructed with a ventilation system that will include exhaust fans as well as fresh air intake fans designed to protect occupants from inhalation of vehicle exhaust. In accordance with the LADBS requirements, the ventilation system will ensure at least four air exchange rates per hour for the lowest level of the parking structure. Additionally, the second level of the parking structure will be ventilated at a rate of approximately two air exchanges per hour in compliance with the California Mechanical Code requirements for parking garages.

As concluded in the Qualitative Health Risk Assessment (See Appendix to this ND), residual concentrations of VOCs in soil vapor, if present, would be much lower than the measured methane gas concentrations and expected exhaust fumes that the ventilation systems are designed to mitigate. The use of the proposed ventilation systems would eliminate any exposure route of VOCs to occupants of the site. Based on this information, there would be no human health risk to workers or future occupants of the site through possible vapor intrusion. Therefore, with regulatory oversight and compliance with all requirements from the relevant regulatory agencies, impacts associated with soil vapor would be less than significant.

Methane

The Project Site is located within a Methane Zone. A Methane Investigation was prepared to determine the methane concentrations and methane design requirements for the Proposed Project (Appendix I to this IS/ND). Three shallow gas probes and two multi-depth probes were installed on the Project Site to determine the level of methane soil gas concentrations at the Project Site. During testing, the highest gas concentration was found to be greater than 50,250 ppm, which was determined to have no methane risk at the Project Site. The Methane Investigation recommends new slab on grade areas and new utility work must be protected per Level V Site Design, of the LADBS, including a subslab membrane and venting system with vertical vent risers, utility seals and warning signage. The system would also include gas detectors with battery backup, additional vent risers/extraction system and audio/visual alarms. The Proposed Project shall be required to comply with the methane design requirements of LAMC Section 91.706.4.1 and Division 71 of Article 1, Chapter IX of the LAMC. The Proposed Project shall provide a methane vapor control system as required by Table 71, Minimum Methane Mitigation Requirements, of the LAMC based on the appropriate Site Design Level V to the satisfaction of the LAFD and the LADBS. With adherence to the methane requirements of the LAMC to the satisfaction of LADBS, the Proposed Project's impacts related to methane would be less than significant.

Asbestos

Prior to the issuance of the demolition permit, in compliance with the regulatory requirements of the LADBS, the Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACM are present in the Project Site buildings. An Operations and Maintenance (O&M) Program should be implemented in order to safely manage the suspect ACMs located at the Project Site. If ACM are found to be present, it will

need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other state and federal regulations. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials that are identified as ACMs would be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations would be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process would be chosen based on experience, reputation, and relationship with local agencies such as SCAQMD and OSHA regional offices. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. As the removal and disposal of ACMs from the Project Site will follow the various guidelines required by SCAQMD Rule 1403, as well as all other applicable state and federal rules and regulations, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Operational Impacts

The Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes that are typically associated with the operation of the Proposed Project, and the use of these substances would comply with State Health Codes and Regulations. As such, the Proposed Project's compliance with mandatory state and federal regulatory compliance measures would ensure that potential impacts associated with the release of a hazardous material would be reduced to less than significant levels.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard (i.e., such as exposure to lead based paint, polychlorinated biphenyls, or asbestos). The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

There are no Los Angeles Unified School District schools or private schools located within one-quarter mile of the Project Site. Localized construction impacts associated with noise, dust and

localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. Since no schools are located within 500 feet from the Project Site, the construction activities from the Proposed Project would not create a hazard to any nearby schools. Further, the proposed haul route exiting and entering the Project Site to the Chiquita Canyon Landfill or the Athens Sun Valley Materials Recovery Facility would travel along Pico Boulevard and utilize the Cotner Avenue on-ramp and Olympic Boulevard/Pico Boulevard off-ramp to and from the I-405 San Diego Freeway. The local haul routes would not pass by any nearby schools along Pico Boulevard. Therefore, construction impacts to nearby schools would be less than significant.

Further, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements. The operational activities of the Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Operational impacts on nearby schools would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

As discussed above, the car wash property is subject to ongoing corrective action under LARWQCB Case No. 900640107 to ensure the protection of human health, safety and the environment. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures and the Applicant's continued compliance with the conditions of the LARWQCB Case No. 900640107 would ensure that potential impacts associated with the release of a hazardous materials would be reduced to less than significant levels.

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?

No Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Santa Monica Airport, located approximately six miles west of the Project Site. Thus, the Project Site is not located within two

miles of an airport. Furthermore, the Project Site is not in an airport hazard area. Therefore, no impact would occur.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is located not in a disaster route according to the Los Angeles West Area Disaster Route Map of Los Angeles County.[35] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[36] Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, emergency vehicle drivers 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. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

g) 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 a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[37] Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant with

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[35] *Los Angeles County Department of Public Works, City of Los Angeles West Area Disaster Route Map, August 13, 2008.*

[36] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

[37] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, accessed August 2019.*

adherence to all applicable regulations and, therefore, would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

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?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduce potential water quality impacts during the construction and operation of a project, the Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles and Ordinance 173,494.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. Under the Construction General Permit Order 2009-0009-DWQ, dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Applicant shall provide

the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

The Project Site is currently developed with a car wash, food stand, and office building. The Project Site is completely covered with impervious surfaces with the exception of some landscaping. Thus, nearly 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains located at the intersection of Beverly Drive and Alcott Street and does not percolate into the groundwater table beneath the Project Site.[38] Following completion of construction, the Proposed Project and the Project Site as a whole would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions and there would not be any increased imperviousness of the Project Site. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC

[38] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed August 2019.*

Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[39]

The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve residential/non-residential uses and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Proposed Project shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Proposed Project and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[40]

In compliance with the LID ordinance requirements, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be

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[39] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

[40] *Ibid.*

submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[41]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and code-compliance procedures, operational water quality impacts would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in response to Checklist Question X(a) the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was not encountered during recent excavations. This area of Los Angeles is not known to have a high groundwater table. Historically, the highest groundwater in this area of Los Angeles is estimated to be more than 40 feet below the ground surface.[42] The Proposed Project would excavate soils approximately 22 feet beneath the Project Site to allow for the construction of the proposed two-level subterranean garage. Because the depth of groundwater is lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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[41] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

[42] *Feffer Geological Consulting, Geotechnical Investigation, Proposed Five-Story Building Over Three Subterranean Levels, 9500-9530 W. Pico Boulevard Los Angeles, CA 90035. (See Appendix C of this IS/ND).*

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.

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial erosion, siltation, pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on the Project vicinity. The Proposed Project is an infill development project on a site that is currently fully developed and is entirely impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. The Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater).

Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shoring during construction of the Proposed Project. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in a Soils Report Approval Letter for the Proposed Project, would ensure that impacts to soil erosion and siltation are less than significant levels. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Proposed Project. Therefore, impacts to substantial erosion or siltation on- or off-site would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology (and the rate and amount of surface water) if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow or would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The Project Site is nearly 100 percent impervious. Implementation of the Proposed Project would not increase site runoff or result any changes in the local drainage patterns. Implementation of the SWPPP, however, would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Proposed Project would not increase the rate or amount of flow from the Project Site or create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems. Impacts associated with localized drainage and surface water runoff would therefore be considered 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; or

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial additional sources of pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level, which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

The Project Site is currently developed, and a majority of the surface water is directed off site to the adjacent storm drain inlets located at the intersection of Beverly Drive and Alcott Street, which is approximately 160 feet south of the Project Site. Storm water retention will be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Proposed Project will be required to demonstrate compliance with the LID Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, which will reduce the Proposed Project's impact to the stormwater infrastructure. As discussed above in response to Checklist Question X (b), the Geotechnical Investigation

concluded based on conditions encountered at the time of exploration, groundwater is not anticipated during construction of the two-level subterranean garage. Therefore, the Proposed Project would not provide substantial additional sources of polluted runoff, and potential impacts to surface water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.[43] A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Map No. 06037C1595G, dated December 21, 2018, indicates that the Project Site is located in an area designated as "Zone X", described as "Areas determined to be outside the 0.2 percent flood plain."[44] The Project Site is located in a highly urbanized area and, as no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body (levee or dam) to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) and if discharges associated with the project operation would create pollution and contamination due to inundation. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

According to the FEMA's flood insurance rate map, the Project Site is outside of a 100-year flood area.[45] Additionally, per a review of the City of Los Angeles General Plan Safety Element, the Proposed Project does not lie within a potential inundation zone related to the flow coming from reservoirs, nor does the Project Site lie with a tsunami hazard area.[46] The Pacific Ocean is located approximately 6.5 miles west of the Project Site. Therefore, the potential for inundation at the Project Site as a result of an earthquake-induced dam failure or tsunami is considered low.

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[43] *City of Los Angeles, Department of City Planning, General Plan Elements, Safety Element Exhibit F, website: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 2019.*

[44] *Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1595G, December 21, 2018, website: https://msc.fema.gov/portal/, accessed August 2019.*

[45] *Ibid.*

[46] *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

Additionally, the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Proposed Project. The use of these substances would comply with State health codes and regulations. Furthermore, the Proposed Project would be designed and constructed with the guidance of the Department of Building and Safety. The City of Los Angeles' Department of City Planning and Department of Building and Safety would review the Proposed Project prior to the issuance of a building permit and provide recommendations to ensure that any impacts from the risk release of pollutants due to inundation are less than significant.

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

Less Than Significant Impact. A significant water quality impact could occur if a project is not consistent with the Los Angeles Regional Water Quality Control Plan or the Sustainable Groundwater Management Act (SGMA), or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of a Groundwater Sustainability Plan.

In 2014, the California Legislature and Governor passed the Sustainable Groundwater Management Act (SGMA), which encourages local agencies to take a leading role in managing their local groundwater resources. The SGMA, a collection of three bills (AB 1739, SB 1168, and SB 1319), provides local agencies with the framework necessary to sustainably manage medium and high priority groundwater basins, as described by the act, with the goal to bring the basins into balance in 20 years. The intent of SGMA is to require sustainable groundwater management practices statewide, which will provide a buffer against drought and climate change. The California Department of Water Resources (DWR) has prioritized all groundwater basins according to certain criteria established in the California Water Code. The rankings are very low, low, medium, and high. SGMA compliance requires that local agencies form Groundwater Sustainability Agencies (GSAs) for medium- and high-priority groundwater basins no later than June 30, 2017 and adopt a Groundwater Sustainability Plan (GSP) no later than January 31, 2022. Currently, the Project Site is located within the Coastal Plain of Los Angeles – Central basin, which is neither classified as a medium nor high priority groundwater basin. Therefore, the Project Site is not subject to a sustainable groundwater management plan. Nevertheless, as discussed above, adherence to Chapter VI, Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

The applicable water quality control plan applicable to the Proposed Project is the LARWQCB Water Quality Control Plan for the Los Angeles Region (Basin Plan), which was adopted on June 13, 1994. The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by

reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. As discussed previously under Question X(a), the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Proposed Project. The use of these substances would comply with State health codes and regulations. Further, the Proposed Project would comply with all federal, state and local regulations governing stormwater discharge. Additionally, the Proposed Project would be required to comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality. Therefore, the Proposed Project would not include potential sources of water pollutants that would have the potential to substantially degrade water quality, and impacts to water quality would be less than significant.

As discussed within this section, the Proposed Project is not subject to a Groundwater Sustainability Plan and would not conflict with or obstruct implementation of the LADWP Water Quality Control Plan. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding areas are served by the existing City of Los Angeles drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects in the Project vicinity would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site, and the related project sites, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

a) Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located in an urbanized area within the West Los Angeles Community Plan Area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning designations for the Project Site are zoned C4-1VL-O (Commercial Zone) with a General Plan land use designation of Neighborhood Commercial. The zones designated in the Community Plan corresponding to the Neighborhood Commercial designation include the C1, C1.5, C2, C4, RAS3, RAS4, and P zones; the existing zoning on the Project Site is thus consistent with the General Plan land use designation. As discussed in Section 3. Project Description and shown in Figure 3.3 and Figure 3.5, the Project Site is surrounded by a mix of commercial uses (including restaurants and retail), multi-family residential, hotel, and office uses. These land uses range in height from one- to eight-stories above grade. Properties immediately bordering the Project Site are zoned [Q]R3-1-O or [Q]R3-1VL-O with a General Plan land use designation of Medium Residential or C4-1VL-O zone with a General Plan land use designation of Neighborhood Commercial.

The Proposed Project would involve demolishing the existing structures for the construction, use, and maintenance of a six-story mixed-use building with a total of 108 residential dwelling units and 3,250 square feet of commercial space. The Project vicinity contains many multi-family residential developments to the south of the Project Site and commercial land uses along Pico Boulevard. The proposed mixed-use residential and commercial building would not be out

of character with the surrounding land uses and would be compatible with the multi-family residential neighborhood to the south of the Project Site and the commercial land uses along Pico Boulevard. No separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and a less than significant impact would occur.

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?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. A significant impact may also occur if a project would conflict with any applicable land use plan, policy, or the regulations of an agency that has jurisdiction over the Project Site.

The Project Site is located within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional plans. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the West Los Angeles Community Plan, and the Los Angeles Municipal Code (LAMC), which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With the approval of the discretionary requests, the Proposed Project would conform to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section III, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the 2016 AQMP.

SCAG Regional Comprehensive Plan and Guide

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks and between planning strategies. Connect SoCal 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. The Proposed Project would be consistent with the goals and policies set forth in the Connect SoCal, as the Proposed Project would redevelop an underutilized site with a mixed-use residential and commercial project that would provide 108 dwelling units and 3,250 square feet of commercial space. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities in an area served by mass transit. Furthermore, as the Proposed Project would result in an increase of 291 permanent residents,[47] the Proposed Project would be consistent with SCAG's growth projections.

Local Plans

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.

Those elements that would be most applicable to the Proposed Project are the Framework Element, Mobility Plan, and the Housing Element. The Framework Element provides citywide guidelines and a foundation in which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies on. The Proposed Project would promote the Framework Land Use Chapter's objectives and policies for multi-family residential and commercial development. These objectives and policies include: provide for the stability and enhancement of multi-family residential neighborhoods and allowing for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved; accommodate the development of multi-family residential units in areas designated in the community plans in accordance with the zoning densities; and improve the

[47] *See Checklist Question XIV a) Population and Housing.*

quality of new multi-family dwelling units based on the urban form and neighborhood design standards.

The Proposed Project would conform to the General Plan Framework Housing Chapter, the Mobility Plan, and the Housing Element goals by enhancing housing supply in the City. The Project provides the area with greater diversity in type and cost of housing that increases housing opportunities for a larger range of income levels. The Proposed Project's 108 dwelling units would also be accessible to all persons without discrimination. The development would generate new residences that are within close proximity to bus and rail lines and commercial and office areas that provide services and job opportunities. Additionally, the Proposed Project would enhance the surrounding community by developing an infill site with a pedestrian friendly development.

Framework Element

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

The Framework Element provides citywide guidelines and a foundation on which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. Table 4.12, below, includes the consistency analysis with the Framework Element's goals, objectives, and policies relevant to the Proposed Project. The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. As shown in Table 4.12, the Proposed Project would be consistent with the objectives and policies set forth in the Framework Element of the General Plan.

Table 4.12
Project Consistency with Applicable Objectives and Policies of the Framework Element

Objective / Policy	Project Consistency Analysis
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential	**No Conflict.** The Proposed Project would provide new high-quality residential units, with some at reserved affordable levels, as well as small-scale local-serving commercial space, thereby providing a balance of desirable and needed land uses. Thus, the Proposed Project would support this objective.

Objective / Policy	Project Consistency Analysis
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 liveable city.	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No Conflict.** As discussed above, the Proposed Project would include multi-family residential uses, which would provide valuable needed housing as well as new foot traffic for new and existing businesses. Additionally, the proposed restaurant and retail areas would provide new commercial space, thus increasing business opportunities and contributing to the overall economy of the West Los Angeles area.
Objective 3.2: 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.	**No Conflict.** The Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options, such as walking and biking. As an urban infill development, the Proposed Project would reduce vehicles-per-miles traveled, promote alternatives to driving, and aim to improve air quality.
Policy 3.2.2: Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and carious densities of residential development within neighborhoods at appropriate locations.	**No Conflict.** The Proposed Project includes the development of a mixed-use residential and commercial development. The Proposed Project incorporates aspects of a compact development by providing the proposed development on a previously developed commercial lot. The Proposed Project is further similar in scale and compatible with adjacent and surrounding development.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use appropriate locations.	**No Conflict.** The Proposed Project would encourage improved access and mobility by providing residential and commercial uses near a variety of commercial uses along Pico Boulevard. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and other nearby multi-family residential developments. In addition, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project promotes the use of a variety of transportation options including on-site bicycle parking spaces, which promotes walking, biking, and the use of public transportation.
Objective 3.3: Accommodate projected	**No Conflict.** The Proposed Project's population growth

Objective / Policy	Project Consistency Analysis
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.	would be well within the projected population and employment growth in SCAG's 2020 Connect SoCal plan for the City of Los Angeles, which is further discussed in Section XIV, Population and Housing. Additionally, the Proposed Project would promote a pedestrian-oriented environment with options for public transportation. The Proposed Project would also include utility infrastructure and would update any infrastructure improvements, if necessary. Further, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety.
Policy 3.3.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Not Conflict.** The Proposed Project would replace the existing commercial and office land uses with the development of a mixed-use residential and commercial building on a Project Site zoned C4-1VL-O and has a General Plan land use designation of "Neighborhood Commercial." The C4 zone allows for the proposed multi-family uses and commercial uses. The Proposed Project would develop a mixed-use development that would be visually compatible with the surrounding commercial, residential, and office uses. Therefore, the Proposed Project would enhance the character of the surrounding mixed uses and would not conflict with this policy.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** As stated above, the Proposed Project includes the development of a mixed-use residential and commercial project along a major arterial corridor. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the surrounding West Los Angeles area. The residential and commercial uses on-site would further support the pedestrian activity along Pico Boulevard and Beverly Drive by providing residential near a variety of commercial uses and ground-floor commercial uses that would front these major commercial corridors.
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, and (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevard, referred to as districts, centers, and mixed-use boulevard, in accordance with the Framework Long-Range Land Use Diagram.	**No Conflict.** As stated above, the Proposed Project includes the development of a mixed-use residential and commercial project along a major arterial corridor. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the West Los Angeles area. The residential and ground-floor commercial uses on-site would further support the pedestrian activity along Pico Boulevard and Beverly Drive by providing residential near a variety of commercial uses and providing ground-floor commercial uses that would front these major commercial corridors, which is characterized by a mix of office, entertainment, retail, and residential uses.

Objective / Policy	Project Consistency Analysis
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	**No Conflict.** The Proposed Project would include multi-family residential units that would be available at market rate and the affordable rate. Additionally, 17 percent of the base density units would be reserved as affordable housing units. The Proposed Project's residential units and employment opportunities would be available to all ethnic, social, and economic groups without discrimination. Thus, the Proposed Project would not conflict with this goal.
Policy 3.7.4: Improve the quality of new multi-family dwelling units based on the Standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	**No Conflict.** The Proposed Project would redevelop a site that is currently occupied by a car wash, food stand, and office building. The Proposed Project will provide high-quality residential units with a variety of amenities and incorporates thoughtful features such as (building mass variation, balconies, glazing and active/recreation uses along frontage, etc). In addition, compliance with regulatory compliance measures (relating to aesthetics and discussed in Section I, Aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Proposed Project's construction and operation.
Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.	**No Conflict.** The Proposed Project would promote a pedestrian-oriented environment by providing residential and commercial space that would front Pico Boulevard and Beverly Drive. The Proposed Project's design and ground-floor open space would enhance pedestrian activity in the area, especially within the West Los Angeles area. Additionally, the new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism; and ground-floor commercial/retail fronting Pico Boulevard and Beverly Drive would increase employment opportunities and contribute to the Project Site area's tax base.
Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance with Chapter 5 Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies.	**No Conflict.** As discussed above, the Proposed Project would promote a pedestrian-oriented environment by providing residential and commercial uses that would front Pico Boulevard and Beverly Drive. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the West Los Angeles Community Plan and under provision of City Staff.
Goal 3F: Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	**No Conflict.** The Proposed Project would provide ground-floor commercial/retail spaces that would provide future and existing residents with job opportunities an additional amenities in a central location along a major arterial corridor.
Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**No Conflict.** The Project Site is currently zoned C4-1VL-O with a Neighborhood Commercial General Plan land use designation. The Proposed Project would provide commercial uses, including restaurant and retail spaces that would provide future and existing residents with job opportunities. Thus, the proposed uses are consistent with the zoning and land use designations. Additionally, the

Objective / Policy	Project Consistency Analysis
	new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism. The Proposed Project would be compatible with the character of the surrounding districts and foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the commercial area.
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) and would be available at range of market rates and affordable rate. The Proposed Project would increase the housing choices available in West Los Angeles area, which will increase supply and help reduce upward pressure on housing costs. Additionally, 17 percent of the base density units would be reserved as affordable units, thereby promoting housing access to all income levels.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**No Conflict.** The Proposed Project would provide multi-family residential units and ground-floor commercial in a highly urbanized area of the West Los Angeles community. The Proposed Project would be within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. Additionally, as the Project Site is an existing commercial property along a major arterial corridor, the Proposed Project would not encroach on any existing lower-density residential neighborhoods.
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	**No Conflict.** The Proposed Project's location encourages the use of alternative transportation and walking and bicycling opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is located in the highly urbanized West Los Angeles area and is surrounded by a mix of retail, commercial, and entertainment services.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**No Conflict.** As discussed above, the Proposed Project is an infill development within a major employment center. The Proposed Project would place residential units and ground-floor commercial space in a transit-rich and pedestrian-oriented area. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location and design of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.
Goal 7G: A range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom units, and three-bedroom units) and would be available at range of market rates and

Objective / Policy	Project Consistency Analysis
transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	affordable rates. The Proposed Project would increase the housing choices available in the West Los Angeles area., which will increase supply and help reduce upward pressure on housing costs. Additionally, 17 percent of the base density units would be reserved as affordable units, thereby promoting housing access to all income levels. Further, the Proposed Project's close proximity to public transportation would allow residents to live and work in the City.
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. **Policy 7.2.3:** Encourage new commercial development in proximity to rail and bus transit corridors and stations.	**No Conflict.** The Proposed Project would redevelop a site that is currently occupied by a car wash, food stand, and office building with the development of a mixed-use residential and commercial building, which would provide new commercial space for businesspersons in West Los Angeles for the existing surrounding community. The Project Site is also directly served by multiple buses (refer to Section 3, Project Description for description of public transportation serving the Project Site). The Proposed Project would implement the following features to reduce energy demands and assure maximum environmental quality: proximity to mass transit, in-fill smart growth, and resource conservation. The Proposed Project would also implement project design features, and regulatory compliance measures as applicable to ensure maximum feasible environmental quality.
Source: City of Los Angeles Department of City Planning, Framework Element, December 11, 1996.	

Mobility Plan 2035

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Proposed Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035;

- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035. The Mobility Plan 2035 identifies Pico Boulevard as a Tier 3 Bicycle Lane in the part of the Bicycle Enhanced Network.

The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. Several streets in the study area are included within the planned Neighborhood Enhanced Network, including Beverwil Drive. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area. With respect to the Mobility Plan's stated objectives, the Proposed Project would increase households within one mile to the Transit Enhanced Network, provide housing within one-half mile to high quality bicycling facilities, and increase the combined mode split of persons who travel by walking, bicycling or transit. Table 4.13, below, discusses the Proposed Project's consistency with the Mobility Plan. As shown in Table 4.13, the Proposed Project would promote the goals of the Mobility Plan.

Table 4.13
City of Los Angeles Mobility Plan Consistency Analysis

Mobility Plan Key Goals	Project Consistency Analysis
(1) Safety First: Crashes, speed, protection, security, safety education, and enforcement	**No Conflict.** The Proposed Project would not include unusual or hazardous design features. Primary vehicular access would be provided via Beverly Drive, adjacent to the Project Site. The Proposed Project does not include any hazardous design features, which could impede emergency access. The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety. Therefore, the Proposed Project would not substantially increase hazards due to design features, or incompatible uses, and would not hinder this goal.
(2) World Class Infrastructure: Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.	**No Conflict.** This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project Site's location near mass transit, walking distance to services, retail stores, and employment opportunities, and the availability of bike parking located on the Project Site promotes a variety of transportation options. Thus, the Proposed Project would promote this goal.
(3) Access for All Angelenos: Affordability,	**No Conflict.** The Project Site is located in an

Mobility Plan Key Goals	Project Consistency Analysis
vulnerable users, land use, operations, reliability, demand management, community connections.	urbanized area of Los Angeles. The Proposed Project would develop new residential and commercial uses in a central transit-rich location within walking distance of numerous services, retail, restaurants, and commercial uses. The Project Site is located within walking distance of numerous bus routes with peak commute service intervals of 15 minutes or less. Additionally, the Proposed Project would reserve 17 percent of the base density units as affordable units, thereby promoting housing access to all income levels The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this goal.
(4) Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.	**No Conflict.** The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Sections III. Air Quality, VI Energy Use, and VIII. Greenhouse Gas Emissions, operational emissions and greenhouse gas emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Proposed Project would not conflict with this goal.
Sources: City of Los Angeles General Plan, Mobility Plan 2035, September 7, 2016. *Parker Environmental Consultants, 2020.*	

West Los Angeles Community Plan

The Project Site is located within the West Los Angeles Community area. Therefore, all development activity on-site is subject to the land use goals, objectives and policies of the West Los Angeles Community Plan (Community Plan). The Project Site has a General Plan land use designation of Neighborhood Commercial. The Neighborhood Commercial land use designation contains numerous policies designed to enhance commercial activity, it also contains many policies designed to stimulate the development of residential uses within certain commercial and residential accessory or RAS zones. The Los Angeles Municipal Code allows the development of residential uses within certain commercial zones at a base density commensurate with the R4 zone.

The Proposed Project would revitalize the area with the development of a six-story mixed-use residential and commercial building. The Proposed Project would provide a total of 108 units (consisting of 35 studio units, 51 one-bedroom units, 16 two-bedroom units, and six three-bedroom units), 3.250 square feet of commercial space (1,000 square-foot restaurant and 2,250 square feet of retail space) with a total of 134 automobile parking spaces and 91 bicycle spaces. The automobile parking spaces would be provided in the within two levels of subterranean

parking. The Proposed Project would provide a variety of on-site amenities, which would be located on the first floor, the roof deck, and in private residential balconies. A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the West Los Angeles Community Plan for Residential Land Uses is presented in Table 4.14, below.

Table 4.14
Project Consistency with Applicable Objectives and Policies of the West Los Angeles Community Plan Land Use Element for Residential and Commercial Land Uses

Objective / Policy	Project Consistency Analysis
Residential	
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) and would be available at range of market rates and affordable rates. The Proposed Project would not displace any existing housing and would increase the housing choices available in West Los Angeles, which will increase supply and help reduce upward pressure on housing costs. In addition, of the 108 proposed residential units, 17 percent of the base units (13 units) would be reserved at the "very low income" level, thereby promoting access to housing for residents of all income levels. Thus, the Proposed Project supports this objective.
Policy 1-1.1: Protect existing single family residential neighborhoods from new out-of scale development and other incompatible uses.	**No Conflict.** The Project Site is currently developed with a car wash, food stand, and office building. There are no single-family homes on the Project Site and no single-family residential neighborhoods are located adjacent or near the Project Site. As such, the Proposed Project would not conflict with this policy.
Policy 1-1.3: Provide adequate multi-family residential development.	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) in the West Los Angeles area. Thus, the Proposed Project would not conflict with this policy.
Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to adequate services and facilities.	**No Conflict.** The Proposed Project would place residential dwelling units in a transit-rich and pedestrian-oriented area fronting Pico Boulevard and Beverly Drive. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Proposed Project would be located near adequate services and facilities, which would reduce vehicular trips and congestion. Thus, the Proposed Project supports this objective.
Policy 1-2.1: Locate higher residential	**No Conflict.** The Proposed Project would provide a

densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	total of 108 residential dwelling units within a six-story mixed-use residential and commercial building. The Proposed Project would place residential dwelling units in a transit-rich and pedestrian-oriented area. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Proposed Project would not conflict with this policy.
Objective 1-4: To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens.	**No Conflict.** The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) and would be available at range of affordable and market rates. The additional units will increase supply and help reduce upward pressure on housing costs. In addition, of the 108 proposed residential units, 17 percent of the base units (13 units) would be reserved at the "very low income" level. Thus, the Proposed Project supports this objective.
Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	**No Conflict.** The Proposed Project would redevelop a site that is currently occupied by a car wash, food stand, and office building. As discussed above, the Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) and would be available at range of affordable and market rates. In addition, of the 108 proposed residential units, 17 percent of the base units (13 units) would be reserved at the "very low income" level. Thus, consistent with this policy, the Proposed Project would provide choices in type, quality, and price of housing on a redeveloped site.
Policy 1-4.2: Ensure that new housing opportunities minimize displacement of residents.	**No Conflict.** The Proposed Project would redevelop a site with a mixed-use multi-family residential that is currently occupied by a car wash, food stand, and office building. Therefore, the Proposed Project would not displace residents and would not conflict with this policy.
Policy 1-4.3: Encourage multiple residential development in specified commercial zones.	**No Conflict.** The Project Site is zoned C4-1VL-O (Commercial Zone) with a General Plan land use designation of Neighborhood Commercial. The Proposed Project would redevelop a site with a six-story mixed-use residential and commercial building that is currently occupied by a car wash, food stand, and office building. Therefore, the Proposed Project would not conflict with this policy.
Commercial	
Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.	**No Conflict.** The Proposed Project has direct frontage along Pico Boulevard and Beverly Drive, which contain numerous retail, restaurants, and commercial uses. The Proposed Project would consist of a mixed-use residential and commercial development, which would provide additional restaurant and retail to the area and

	provide additional foot traffic for the surrounding commercial uses along Pico Boulevard and Beverly Drive. Thus, the Proposed Project supports this objective.
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.	**No Conflict.** The Proposed Project would include a six-story mixed-use residential and commercial building. Pico Boulevard and Beverly Drive contain a variety of commercial uses. The surrounding area is zoned for commercial uses. As such, the Proposed Project would be located in an existing commercial area with shopping centers. Thus, the Proposed Project would be consistent with this policy.
Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.	**No Conflict.** The Proposed Project would consist of a mixed-use residential and commercial development in an area zoned for mixed-use uses. The Proposed Project does not only consist of residential components. Therefore, the Proposed Project would be consistent with this policy.
Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.	**No Conflict.** The Proposed Project would place ground-floor commercial uses in a transit-rich and pedestrian-oriented area. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site's location near mass transit and in walking distance to services, retail stores, and restaurants promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Proposed Project would be located near adequate services and facilities, which would reduce vehicular trips and congestion. Thus, the Proposed Project supports this objective.
Policy 2-2.1: Encourage Pedestrian-oriented design in designated areas and in new development.	**No Conflict.** Primary pedestrian access to the Project Site would be provided from Pico Boulevard and Beverly Drive. Thus, the Proposed Project would be landscaped and designed to promote a pedestrian-oriented environment.
Objective 2-3: To enhance the appearance of commercial districts.	**No Conflict.** The Proposed Project would replace a car wash, food stand, and office building with a new six-story mixed-use building with residential and commercial land uses. Coordination with the Department of City Planning would ensure the Proposed Project would be attractively designed and landscaped to enhance the surrounding commercial districts. Compliance with regulatory compliance measures (relating to aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Proposed Project's construction and operation.
Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent	**No Conflict.** The Proposed Project would be designed and landscaped in accordance with applicable design guidelines. These guidelines and standards are in place to ensure that projects are designed and developed to achieve a high level of quality, have a

neighborhoods.	distinctive character, and are compatible with existing commercial uses and development. Therefore, the Proposed Project would not conflict with this policy.
Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.	**No Conflict.** Coordination with the Department of City Planning would ensure the Proposed Project would be attractively designed and landscaped in accordance with applicable design guidelines to enhance the surrounding commercial districts. These guidelines and standards are in place to ensure that projects are designed and developed to achieve a high level of quality, have a distinctive character, and are compatible with existing uses and development. Therefore, the proposed Project would not conflict with this policy.
Source: City of Los Angeles, West Los Angeles Community Plan, Land Use and Planning Element. Parker Environmental Consultants, 2020.	

Los Angeles Municipal Code

The Project Site is located within the City of Los Angeles, which is also subject to the applicable sections of the City of Los Angeles Municipal Code (LAMC). The Project Site is currently occupied by a car wash, food stand, and office building on an approximately 25,823 square-foot lot. The Project Site is currently zoned C4-1VL-O. The Project Site General Plan land use designation is Neighborhood Commercial. Since the Proposed Project would provide 17 percent of the base density units reserved at the “very low income” level, the Proposed Project is eligible for a density bonus and requests four off-menu incentives, pursuant to LAMC Section 12.22 A.25(g)(3). The following paragraphs discuss the Proposed Project’s compliance with the building standards of the LAMC.

Land Use

The Project Site is zoned C4-1VL-O with a General Plan land use designation of Neighborhood Commercial. Pursuant to LAMC Section 12.16.1, mixed-use residential and commercial developments are allowed on a C4 zone. As such, the Proposed Project is consistent with the C4 zone, and the corresponding General Plan land use designations, which allow for the proposed mixed residential-and-commercial uses by right. Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Floor Area

The Project Site includes approximately 25,823 square feet of lot area. The Project Site is located in Height District 1VL, which limits development to a floor area ratio (FAR) of 1.5:1, resulting in an allowable floor area of 38,734 square feet of floor area. However, pursuant to LAMC Section 12.22 A.25(g)(3), the Applicant requests an off-menu incentive to increase the allowable FAR to a maximum of 3.75:1. Thus, the resulting allowable floor area for the Project Site would be 96,871 square feet. The Proposed Project includes approximately 96,871 square feet of floor area, which results in a FAR of 3.75:1. As such, with approval of the discretionary

requests, the Proposed Project would be consistent with the allowable FAR pursuant to the LAMC.

Height

As stated previously, the Project Site is located in Height District 1VL, which limits the height of the development to 45 feet or three stories. For buildings used entirely for residential uses, development is limited by the height of 45 feet, and there is no limit on stories. Pursuant to LAMC Section 12.22 A.25(g)(3), the Applicant is requesting an off-menu incentive to increase the allowable height to 72 feet and six stories above grade. The proposed six-story mixed-use building is planned for a maximum roof height of 72 feet above grade and would reach a maximum height of 82 feet at the highest architectural element. Thus, with approval of the discretionary requests, the Proposed Project would be consistent with the allowable height pursuant to the LAMC.

Density

Under its zoning designation, residential uses proposed on a C4 zone shall be in compliance with the density regulations of the R4 Zone. As such, the minimum lot area per dwelling unit is 400 square feet. Pursuant to LAMC Section 12.22.C.16, the area of one-half of the alley may be included for purposes of calculating density. With the addition of the area of one-half of the alley (2,600 square feet), the total area for the density calculation would be 28,432 square feet. Therefore, a base density of 72 dwelling units would be permitted for the Project Site. Pursuant to LAMC Section 12.24 U.26, the Applicant requests a Conditional Use to allow a 50 percent increase in density, resulting in up to 108 units. In order to achieve the 50 percent increase, the Proposed Project would be required to set aside 17 percent of the base density as very low-income units. The Proposed Project proposes a total of 108 dwelling units. Therefore, with the density bonus and approval of the discretionary requests, the Proposed Project would be consistent with the allowed density on the Project Site pursuant to the LAMC.

Setbacks

Pursuant to LAMC Section 12.16(C), no front yard setback is required in the C4 Zone for commercial developments. For mixed-use buildings, pursuant to LAMC Section 12.22A.18(c)(3), no yard requirements shall apply to the residential portions of buildings located on lots in the CR, C1, C1.5, C2, C4, and C5 Zones used for combined commercial and residential uses, if such portions are used exclusively for residential uses, abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. As such, no setbacks are required for the Proposed Project. Nevertheless, the Proposed Project would provide a 5-foot front yard setback fronting Pico Boulevard, 9-foot side yard setbacks fronting Reeves Street and Beverly Drive, and a 15-foot rear yard setback along the alleyway. Therefore, the Proposed Project would be consistent with setback requirements pursuant to the LAMC.

Open Space

As summarized in Table 3.3 of the Project Description, the Proposed Project would be required to provide 12,600 square feet of open space. The Proposed Project would provide approximately 12,600 square feet of open space in the form of a courtyard, plaza, amenity rooms, roof deck, and private open space. Additionally, the Proposed Project would be required to provide a minimum of one tree per every four units, for a total of 27 required trees on-site. The Proposed Project would provide a minimum of 27 trees on-site. Therefore, the Proposed Project would be consistent with the allowable open space on the Project Site pursuant to the LAMC.

Vehicle Parking

Parking for the proposed mixed-use building on-site would be provided within two levels of subterranean parking. Vehicular access to the subterranean parking garage would be provided via a full-access driveway along Beverly Drive on the southeast corner of the Project Site. Pursuant to LAMC Section. 12.22.A.25(d)1 and Density Bonus Parking Option #1, the Proposed Project would be required to provide one parking space for each unit with 0-1 bedroom, 2 parking spaces for each unit with 2-3 bedrooms, and 2.5 parking spaces for each unit with 4- or more bedrooms. Via utilization of Parking Option #1 as well as a 10% residential bicycle parking reduction via LAMC Section 12.21 A.4, the Proposed Project would be required to provide 117 residential parking spaces. The Proposed Project would include 120 residential parking spaces, and thus would meet this requirement. Additionally, pursuant to LAMC Section 12.21 A(c), the Proposed Project is required to provide one parking space per 200 square feet of small restaurant space and one parking space per 250 square feet of retail space, resulting in a total requirement of 14 non-commercial vehicle parking spaces. The Proposed Project would provide a total of 134 parking spaces within the parking garage (120 residential spaces and 14 commercial spaces). Therefore, as summarized in Table 3.4, the Proposed Project would be consistent with the applicable parking requirements, with approval of the discretionary requests.

Bicycle Parking

The Proposed Project would provide on-site bicycle parking and storage spaces for short-term and long-term bike storage. All short-term and long-term bike parking would be spread throughout the lower basements to the ground floor. Pursuant to LAMC Section 12.21 A.16 and summarized in Table 3.5 in the Project Description Section, the Proposed Project is required to supply 10 short-term bicycle parking spaces and 81 long-term bicycle parking spaces, for a total of 91 bicycle parking spaces. The Project proposes to provide 91 spaces, consistent with the allocations for long-term and short-term spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking. As such, the Proposed Project would be consistent with the Bicycle Parking Ordinance.

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site. With approval of discretionary requests and

adherence to appropriate regulatory compliance measures, any impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable and impacts would be less than significant.

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ-2 zone) or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is zoned C4-1VL-O. The Project Site is not located within an oil field or drilling area.[48] Additionally, the Project Site is not located within a Mineral Resources Zone 2 (MRZ-2).[49] Furthermore, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Since no mineral extraction is occurring on-site, the development of the Proposed Project would not result in a loss of extracting mineral resources. The Project Site is currently developed with a car wash, food stand, and office building. Development of the Project Site would not block or hinder access or availability of mineral resources, since there are currently no extraction activities on-site and no plans to extract mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and no impact would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resources Zone 2 (MRZ-2).[50] Additionally, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. Therefore, no impact to locally important mineral resources would occur.

Cumulative Impacts

No Impact. The analysis of cumulative impacts to mineral resources is generally site-specific. As such, the potential for cumulative impacts to occur is geographically limited. Based on the City's Environmental and Public Facilities Maps, the surrounding Project Site area is not located within a MRZ-2 Zone.[51] Therefore, cumulative development on similar sites within the City of Los Angeles would not have the potential to impact the availability of a locally important mineral resource. Therefore, cumulative development within the region would not result in the loss of availability of some mineral resources. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. The Proposed Project would not result in loss of, or loss of access to, a mineral resource. Therefore, the Proposed Project's contribution to the cumulative loss of available mineral resources or of a known mineral resource that would be of

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[48] *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, 1996.*

[49] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

[50] *Ibid.*

[51] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

value to the region and/or the residents of the state would not be cumulatively considerable. As such, no impact would occur.

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?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as

well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

> L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
>
> L_{max} – The maximum instantaneous noise level experienced during a given period of time.
>
> L_{min} – The minimum instantaneous noise level experienced during a given period of time.
>
> CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the

recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[52]

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a range of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.[53] Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially

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[52] *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

[53] *California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.*

windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.[54]

Ambient Noise Levels

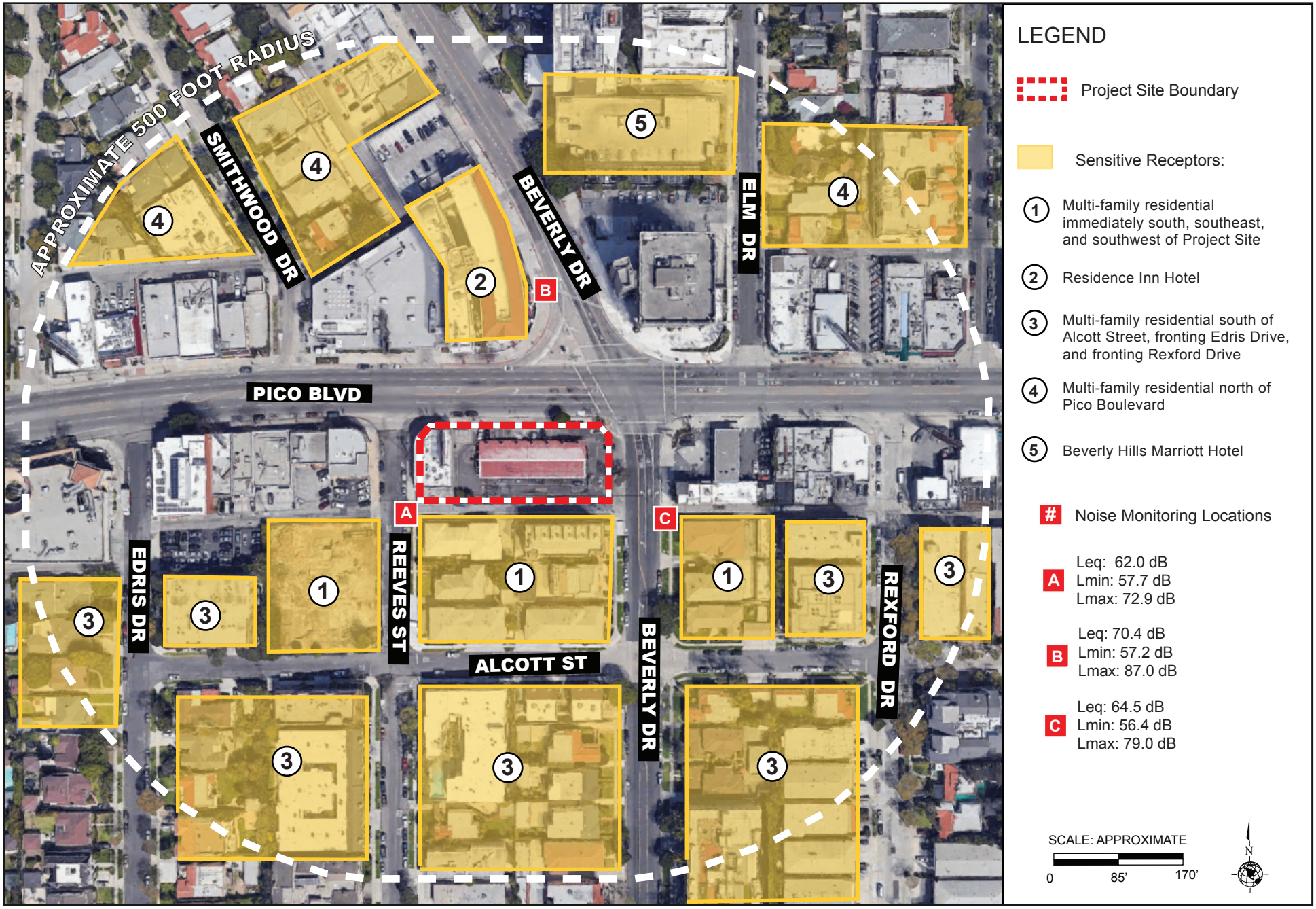
To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations near the Project Site and fronting the nearby land uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix F, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.15, Existing Ambient Daytime Noise Levels. As shown in Table 4.15, the ambient noise in the vicinity of the Project Site ranges from 62.0 to 70.4 L_{eq}. The maximum instantaneous noise level during the three 15-minute recordings was 87.0 dB L_{max} along Beverly Drive, where a vehicle honked by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels was vehicle traffic during the daytime hours, including cars, buses, and delivery trucks.

Table 4.15
Existing Ambient Daytime Noise Levels

ID	Location	Primary Noise Sources	Noise Level Statistics [a]		
			L_{eq}	L_{min}	L_{max}
A	On the eastern side of Reeves Street, at the southwest corner of Project Site	Low vehicle traffic, low pedestrian activity	62.0	57.7	72.9
B	On the western side of Beverly Drive, north of Pico Boulevard	Moderate vehicle traffic (including buses and delivery trucks), pedestrian activity	70.4	57.2	87.0
C	On the eastern side of Beverly Drive, southeast of the Project Site	Moderate vehicle traffic (including delivery trucks), low pedestrian activity	64.5	56.4	79.0

Notes:
[a] *Noise measurements were taken on Thursday, February 13, 2020 at each location for a duration of 15 minutes. See Appendix F of this IS/ND for noise monitoring data sheets.*
Parker Environmental Consultants, 2020.

[54] *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2008.*



Source: Google Earth, Aerial View, 2019.

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Figure 4.2
Noise Monitoring and Sensitive Receptor Location Map

Sensitive Receptors

Several noise sensitive land uses are located adjacent to and in the vicinity of the Proposed Project. For purposes of assessing noise and groundborne vibration impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

1) Multi-family residences immediately south, southeast, and southwest of the Project Site;
2) Residence Inn Hotel, located at 1177 S. Beverly Drive;
3) Multi-family residences further south, east, and west of the Project Site, fronting Alcott Street, Edris Drive, and Rexford Drive;
4) Multi-family residences north of Pico Boulevard; and
5) Beverly Hills Marriott Hotel, located at 1150 S. Beverly Drive.

The locations of these land uses relative to the Project Site are depicted in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5, Photographs of the Surrounding Land Uses.

a) Result in 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?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Further, as specified in LAMC Section 112.04, a significant impact would occur if construction equipment was operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 4.16, Community Noise Exposure Level (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table 4.16
Community Noise Exposure Levels (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

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

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Construction Noise

Construction of the Proposed Project would require the use of heavy equipment for demolition, grading, building construction, and architectural coatings. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Table 4.17 identifies the representative noise levels for the types of construction equipment anticipated to be used for the Proposed Project,[55] including estimated usage factors found in the U.S. Department of Transportation, Federal Highway Administration, Roadway Construction Noise Model. The noise levels listed in Table 4.17, below, represent the A-weighted maximum sound level (L_{max}), measured at a distance of 50 feet from the construction equipment.

Table 4.17
Noise Data for Selected Construction Equipment

Construction Phases	Construction Equipment	Estimated Usage Factor %	Actual Measures Noise Level at 50 Feet (dBA L_{max})
Demolition/Clearing	Concrete/Industrial Saws (1)	20	90
	Rubber Tired Dozer (1)	40	82
	Tractor/Loader/Backhoe (2)	40	78
Grading	Concrete/Industrial Saws (1)	40	82
	Excavator (1)	40	78
	Grader (1)	40	85
	Rubber Tired Dozer (1)	40	82
	Tractor/Loader/Backhoe (2)	40	78
Building Construction	Cement and Mortar Mixers (1)	40	79
	Cranes (1)	16	81
	Forklifts (2)	20	75
	Generator Sets (1)	50	81
	Pavers (1)	50	77
	Rollers (1)	20	80
	Tractor/Loader/Backhoe (2)	40	78
Architectural Coating	Aerial Lifts (2)	20	75
	Air Compressors (4)	40	78

Source: FHWA, Roadway Construction Noise Model, Construction Noise Prediction, (at Table 1 CA/T Equipment noise emissions and acoustical usage factors database, January 2006.

It should be noted that not all construction noise equipment would be utilized concurrently during each phase and the location and spacing of heavy construction equipment and machinery would vary over the course of construction. Mobile equipment moves around the construction site with power applied in cyclic fashion (bulldozers, loaders), or to and from the site (trucks). Because the precise numbers and locations of equipment operating at the same

[55] *Based on the construction equipment identified in the CalEEMod worksheets for the air quality and greenhouse gas emissions models presented in Appendices A and D to this ND.*

time are not known, this analysis follows the recommended procedures contained in the Federal Transit Administrations Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment. Pursuant to these procedures, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.

As shown in Table 4.18, Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Barrier, the ambient exterior noise levels without any attenuation barriers in place would range from 62.0 dBA to 80.7 dBA. As such, unattenuated construction noise levels could exceed 75 dBA at a distance of 50 feet from the Project Site (in conflict with LAMC 112.05) and would exceed ambient noise levels by more than 5-dBA threshold at Sensitive Receptor 1, the multi-family residential to the south, southwest, and southeast (in conflict with LAMC 112.04). As such, the Proposed Project would incorporate compliance measures to further attenuate construction noise to the maximum extent feasible.

Table 4.18
Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Barrier

ID[1]	Ambient Noise (dBA L_{eq})[2]	Noise Level Impact (dBA Leq) by Phase[3, 4]				Construction Noise Threshold (dBA Leq)**	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating		
1	62.0	80.7	80.5	75.7	74.5	67.0	13.7
2	70.4	74.1	73.9	69.1	67.9	75.4	0.0
3	64.5	57.6	57.4	52.5	51.3	69.5	0.0
4	70.4	58.6	58.5	53.6	52.4	75.4	0.0
5	70.4	56.1	56.0	51.1	49.9	75.4	0.0

Notes:
1. ID refers to the sensitive receptor locations identified in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
2. Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
3. An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
4. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.
5. The threshold of significance is 5 dBA above the ambient noise level (LAMC Sec. 112.04).
Source: Parker Environmental Consultants, LLC, (see Appendix F, Noise Monitoring Data and Calculation Worksheets).

To ensure compliance with the LAMC noise limits identified above, a temporary noise barrier would be installed along the property lines to block the line-of-sight between the noise sources and surrounding sensitive receptors. The construction of a temporary ¾ inch plywood noise barrier would be capable of attenuating the noise level by approximately 20 dBA. Additionally, noise control efforts to limit the construction activities to permissible hours of construction,

incorporate noise shielding devices and sound mufflers, echo barriers, and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. Localized and portable sound enclosures would be used, as necessary, to significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10-20 dBA noise reduction or more if the barrier is doubled up. Pursuant to LAMC Chapter IV, Article 1, Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and federal holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements.

Further, the Applicant would be required to post informational signage providing contact information to report complaints regarding excessive noise. The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Affected residents and business owners would thus be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

Implementation of the regulatory compliance measures discussed above would reduce the noise levels associated with construction of the Proposed Project to nearby residents to the maximum extent that is technically feasible, in compliance with LAMC Section 112.05 and 112.04. As noted in Table 4.19, Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Barriers, estimated construction noise impacts would be substantially reduced to less than significant levels. Noise levels at each of the five receptors would be less than 75 dBA at a distance of 50 feet from the Project Site and would not be more than 5-dBA above ambient noise levels at any of the sensitive receptors. Thus, the Proposed Project's construction noise levels would be compliant with the LAMC noise limits and would be less than significant without mitigation.

Table 4.19
Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Barriers

ID[1]	Ambient Noise (dBA L_{eq})[2]	Noise Level Impact (dBA Leq) by Phase [3, 4]				Construction Noise Threshold (dBA Leq) [5]	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating		
1	62.0	61.6	60.5	55.7	54.5	67.0	0.0
2	70.4	55.0	53.9	49.1	47.9	75.4	0.0
3	64.5	48.5	47.4	42.5	41.3	69.5	0.0
4	70.4	49.6	48.5	43.6	42.4	75.4	0.0
5	70.4	47.1	46.0	41.1	39.9	75.4	0.0

Notes:
1. ID refers to the sensitive receptor locations identified in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
2. Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
3. An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
4. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.
5. The threshold of significance is 5 dBA above the ambient noise level (LAMC Sec. 112.04).
Source: Parker Environmental Consultants, LLC, (see Appendix F, Noise Monitoring Data and Calculation Worksheets).

Haul Truck Noise

During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 21,040 cubic yards (cy) of soil and approximately 1,455 tons of construction and demolition debris would be exported to a landfill located within the City. The highest daily haul trips would occur during the grading/excavation phase. It is anticipated that 14 cy capacity haul trucks would be used to export soil, resulting in a total of approximately 3,006 haul round trips, or approximately 46 round trips per day (including 23 inbound and 23 outbound trips) for a projected duration of 66 hauling days. It is assumed that haul truck trips would occur uniformly predominately outside of peak hours. The local haul route exiting the Project Site to the Azusa Land Reclamation facility would travel along Pico Boulevard and utilize the Cotner Avenue on-ramp and Olympic Boulevard/Pico Boulevard off-ramp to and from the I-405 San Diego Freeway. A Haul Truck Route program would be described for the Proposed Project and approved by LADOT as part of the Construction Management Plan. Since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved traffic control plan and during the hours as required by the Noise Ordinance, the haul truck noise would be considered less than significant.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the surrounding buildings in the Project vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Adherence to LAMC Section 112.02 would ensure the Proposed Project's noise impacts from HVAC equipment to be less than significant.

Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Project's Transportation Report, the proposed development would result in a net increase of two (2) daily vehicle trips, compared to existing conditions. Therefore, the Proposed Project would not have the potential to double the traffic volumes on any roadway in the vicinity of the Project Site. As such, the Proposed Project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant.

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

Less Than SignificantImpact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

Table 4.20, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 4.20, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4.20
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

Structural Damage Impacts

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts.

Consequently, the FTA and Caltrans adopted vibration standards for buildings which were used to evaluate potential impacts related to project construction. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 4.21, below.

Table 4.21
Vibration Damage Potential Threshold Criteria

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.

With respect to sensitive receptors to structural damage, there are no buildings that directly share a property line with the Project Site. Therefore, the Proposed Project would not have the potential to exceed the groundborne vibration thresholds for structural damage. Furthermore, protection against damage to adjacent structures is provided by existing law. Both the California Civil Code and the LAMC impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 also imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction. Therefore, any groundborne vibration impacts on the surrounding buildings would be less than significant.

Operational Vibration

The Proposed Project would include a mixed-use residential and commercial development and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such,

vibration impacts associated with operation of the Proposed Project would be less than significant.

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?

No Impact. A significant impact may occur if the Proposed Project were located within the vicinity of a private airstrip or within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not located within any airport land use plan or airport hazard zone. Additionally, the Project Site is not located in the vicinity of a private airstrip. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the eight related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. While the Proposed Project's potential noise impacts are less than significant, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Proposed Project, could result in a cumulatively significant noise impact.

There are no related projects located within 500 feet of the Project Site. The closest related project to the Project Site is Related Project No. 2, located approximately 600 feet to the east of the Project Site (see Figure 3.22, Location of Related Project, in Section 3. Project Description). Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. Each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be less than significant, and the Proposed Project's incremental effects would not be cumulatively considerable.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Nevertheless, the siting and development of related projects would be subject to further CEQA review and

evaluated on a case-by-case basis. Thus, the cumulative impact associated with operational noise would be less than significant.

For the Proposed Project's cumulative traffic noise impacts, the Proposed Project would reduce trips in the local vicinity, compared to existing conditions. Therefore, the Proposed Project would not increase ambient roadway CNEL by 5 dBA. As an urban infill project promoting a reduction in VMT and vehicle trips, similar subsequent projects would also not result in a significant increase in traffic that would significantly increase traffic noise. As such, with respect to cumulative traffic noise, the Proposed Project would not be cumulative considerable, and cumulative traffic generated noise impacts would be considered less than significant.

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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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)?

Less Than Significant Impact. A significant impact may occur if the proposed project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 3, 2020, SCAG's Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) - a plan that the Regional Council now calls Connect SoCal. Connect SoCal 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.

Based on the regional growth projections in Connect SoCal, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). SCAG's population and housing projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 4.17, below. Employment within the City is expected to grow by 287,600 jobs, which is an approximate 16 percent increase in employment between 2016 and 2045.

Table 4.22
SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
Households			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
Employment			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%

Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.

On a policy level, the Project would revitalize a developed property in an existing commercial area. The Proposed Project is an infill development project within the West Los Angeles CPA within the City. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.7 million persons by 2040. As shown in Table 4.22, above, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

Construction Impacts

While construction of the Proposed Project would create temporary construction-related jobs, the work requirements of most construction projects 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. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Proposed Project, and no new permanent residents would be generated during construction of the Proposed Project, which could induce substantial population growth. As such, significant housing or population impacts would not result from construction of the Proposed Project.

Operational Impacts

The Project Site is currently developed with a car wash, a food stand, and office building. The Proposed Project would include the demolition of the existing buildings on-site. The Proposed Project would include the construction of a six-story mixed-use residential and commercial building, with a total of 108 dwelling units and 3,250 square feet of commercial space. Population generation is shown in Table 4.23 and Table 4.24, below. It is estimated that the Proposed Project would generate approximately 291 residents and roughly 9 new employees. When accounting for existing employees from the current commercial and office uses, the Proposed Project would result in a net decrease of 27 jobs. Based on the City's current population and household demographics (e.g., an average of 2.69 persons per household for the City of Los Angeles), the construction of 108 additional residential dwelling units would result in an increase in approximately 291 net permanent residents in the City of Los Angeles. [56]

[56] *Based on the U.S. Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Renter-occupied multi-family housing units have an average of 2.69 persons per household (pph).*

Table 4.23
Estimated Proposed Project Residents and Housing Growth

Use	Total Housing Units	Total Residents
Apartments	108	291
TOTAL:	**108**	**291**

Source: Based on the U.S. Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Renter-occupied multi-family housing units have an average of 2.69 persons per household (pph).
Parker Environmental Consultants, 2020.

The proposed increase in housing units and population would be consistent with SCAG's forecast of 426,000 additional households and approximately 837,500 persons in the City of Los Angeles between 2016 and 2045.

With respect to employment growth, it can be assumed that most of the jobs and employees generated by the Proposed Project would already reside within the City of Los Angeles. The additional employees generated by the Proposed Project would contribute to a fraction of one percent of SCAG's employment growth forecast for the City of Los Angeles. Thus, the increase in employment opportunities as a result of the Proposed Project is within SCAG's employment growth forecast. It can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. Thus, any population growth generated by the Proposed Project would be well within SCAG's population growth projections.

Table 4.24
Proposed Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates [a]	Total Employees
Existing Conditions			
Car Wash	7,247 sf	1 employees / 1,000 sf	7
General Office	7,236 sf	4 employees / 1,000 sf	29
		Total Existing Employees:	***36***
Proposed Project			
Restaurant	1,000 sf	4 employees / 1,000 sf	4
Retail	2,250 sf	2 employees / 1,000 sf	5
		Total Project Employees:	***9***
		Less Existing Employees:	*(36)*
		NET Total Employees:	**(27)**

Note: sf = square feet
[a] *The employee generation factor for restaurant and retail uses were taken from LADOT's City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1: Land Use and Trip Generation Base Assumptions, May 2020.*

As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of

Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, impacts related to population and housing would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of a six-story mixed-use building with 108 dwelling units and 3,250 square feet of commercial on a site that is currently occupied by a car wash, food stand, and office building. No displacement of existing housing would occur with the Proposed Project. Thus, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in response to Checklist Question XIV(a), the Proposed Project would not exceed the growth projections of SCAG's 2020 Connect SoCal for the City of Los Angeles subregion. Because population growth potentially associated with the Proposed Project and similar subsequent projects have already been anticipated per SCAG projections, the population growth associated with the Proposed Project and similar subsequent projects would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in commercial land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial and residential land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

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?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

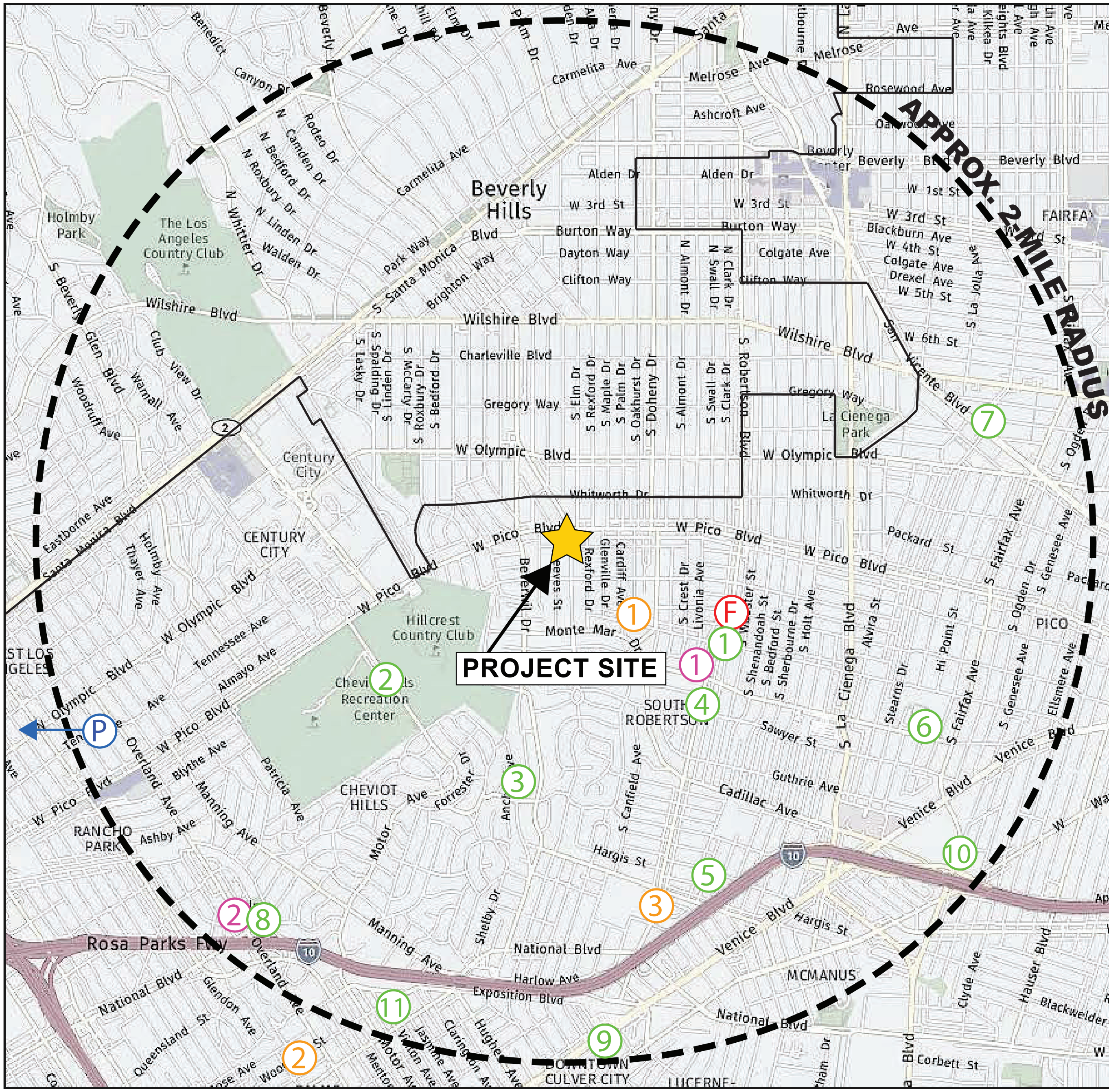
The location of public services (including fire services, police protection services, parks, and libraries) in the Project vicinity and that service the Project Site are shown in Figure 4.3, below.

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.[57]

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

[57] *City of Hayward et al. v. Board of Trustees of the California State University (2015).*



Source: Yahoo Maps, 2019.

LEGEND

F — LAFD Station No. 58

P — West Los Angeles Community Police Station

Schools

1. Canfield Avenue Elementary School
2. Palms Middle School
3. Alexander Hamilton Senior High School

Parks

1. Robertson Recreation Center
2. Cheviott Hills Park, Pool and Rec. Center
3. Irving Schachter Park
4. Claude Pepper Senior Citizen Center
5. Reynier Park
6. Laces Aquatic Center and Recreation Center
7. Carthay Circle Park
8. Palms Recreation Center
9. Media Park
10. Genesee Avenue Park
11. Woodbine Park

Library

1. Robertson Branch Library
2. Palms - Ranch Park Branch Library

City of Los Angeles and City of Beverly Hills Boundary

PARKER ENVIRONMENTAL CONSULTANTS

Figure 4.3
Public Services in the Project Site Vicinity

Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Proposed Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flag persons would be used to facilitate the traffic flow until construction is complete. Further, emergency vehicle drivers 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. Construction of the Proposed Project would result in a less than significant impact.

Operation

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

As indicated above, the City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed or if structures located in the applicable residential area install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Proposed Project would include the construction of a mixed-use residential and commercial building with a total of 108 dwelling units and 3,250 square feet of commercial within the City of Los Angeles, generating an increase of approximately 291 new residents and 9 new

employees.[58] The Proposed Project would increase the utilization of the Project Site by adding residential and commercial uses. The Proposed Project would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 58, located at 1556 S. Robertson Boulevard, which is approximately 1.0 mile (driving distance) southeast of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 58 to the Project Site, fire protection response would be considered adequate.

Furthermore, the adequacy of existing water pressure and water availability in the area of the Proposed Project would be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Further, the Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the Proposed Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety, including installation of fire sprinklers, would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.[59]

The Proposed Project would include the construction of a mixed-use building with a total of 108 dwelling units and 3,250 square feet of commercial space within the City of Los Angeles,

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[58] *Population based on the U.S. Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Renter-occupied multi-family housing units have an average of 2.69 persons per household (pph).*

[59] *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

generating an increase of approximately 291 new residents and 9 new employees.[60] The Proposed Project would increase the utilization of the Project Site by adding multi-family residential and commercial uses to the area. The Proposed Project would potentially increase the demand for LAPD services. The Project Site is located in the West Los Angeles Area division of the LAPD's West Bureau. The Project Site is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue.

Based on correspondence with LAPD, the West Los Angeles Community Police Station is approximately 4.3 miles west and 14 minutes from the Project Site. This time and distance was calculated from a departure point starting from the West Los Angeles Police Station. This arrival time was also configured utilizing some traffic delays, but estimated times of arrival can vary depending on divisional call load, traffic delays and type of call. Within the West Los Angeles Division Area, the Proposed Project is located within Reporting District (RD) 853. According to the LAPD's Computer Statistics (CompStats) Division, the average police response time to emergency, high priority calls in the West Los Angeles area as of March 14th 2020 was 6.3 minutes with a dispatch median time of 1.4 minutes. The medium priority response time as of March 14th 2020 was 18.5 minutes with a dispatch median time of 3.7 minutes. Low priority, non-emergency response time as of March 14th 2020 was 34.8 minutes with a dispatch median time of 10.2 minutes. These response times were taken from the statistics submitted by West Los Angeles Division for a 4-week period between February 16th 2020 through March 14th 2020. During this 4-week period, West Los Angeles Division answered 326 emergency calls for service, 1,104 medium high priority calls and 1,909 low priority calls. The response times stated are adequate performance times for this police division.[61] Table 4.25, West Los Angeles Area Crime Statistics, provides yearly crime statistics for the local Project Site area in the City of Los Angeles.

Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant will be required to ensure the Project Site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much

[60] *Population based on the U.S. Census Bureau's 2013-2017 American Community Survey 5-Year Estimates. Renter-occupied multi-family housing units have an average of 2.69 persons per household (pph).*

[61] *LAPD Correspondence, The 9500 Pico Mixed-Use Project [ENV-2019-4574-EAF], March 20, 2020 (See Appendix K to this IS/ND).*

Table 4.25
West Los Angeles Area Crime Statistics

Crimes	2019 (Year in Total) [a]	2018 (Year in Total)	2017 (Year in Total)
Violent Crimes			
Homicide	1	2	2
Rape	54	63	94
Robbery	200	288	223
Aggravated Assault	286	299	220
Total Violent Crimes	**538**	**652**	**539**
Property Crimes			
Burglary	1,077	1,453	1,177
Motor Vehicle Theft	400	481	494
BTFV	1,511	1,735	1,601
Personal / Other Theft	1,777	1,810	1,647
Total Property Crimes	**4,765**	**5,479**	**4,919**
Child / Spousal Abuse (Part I & II) [b]	332	316	301

Notes:
[a] Crime Statistics for year ending December 31.
[b] Part II Child/Spousal Abuse Simple Assaults not included in Part 1 Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.
Source: LAPD Correspondence, The 9500 Pico Mixed-Use Project [ENV-2019-4574-EAF], March 20, 2020 (See Appendix K to this IS/ND).

of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. As such, with adherence to regulations and project conditions, Project impacts would be less than significant during the construction period.

Operation

LAPD concluded there are no special police protection requirements due to the specific attributes of the Project Site.[62] The Proposed project would not result in the need for new or altered police facilities. The development of the Proposed Project would result in an increase of on-site residents and guests to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime

62 *LAPD Correspondence, The 9500 Pico Mixed-Use Project [ENV-2019-4574-EAF], March 20, 2020 (Appendix K to this IS/ND).*

security lighting and secure parking facilities (Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000). In addition, the continuous visible and non-visible presence of residents and visitors at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents and visitors would be able to monitor suspicious activity at the building entry points. With incorporation of the security design features identified in the LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", which will be confirmed through the Site Plan Review process, the Proposed Project's potential impact upon LAPD services would be less than significant.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 1. The Project Site is currently served by one elementary school, one middle school, and one high school. Table 4.26, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table 4.26
Resident Schools Serving the Project Site

School Name	Grades	Address
Canfield Avenue Elementary School	K-5	9233 Airdrome Street
Palms Middle School	6-8	10860 Woodbine Street
Alexander Hamilton Senior High	9-12	2955 S. Robertson Boulevard
Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed August 2019.		

As shown in Table 4.27, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 21 elementary students, 6 middle school students, and 12 high school students, for a total of approximately 39 students. Based on correspondence with LAUSD, these schools are currently not experiencing overcrowding and can serve the Proposed Project's estimated student generation.[63]

The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code

[63] *LAUSD Correspondence, LAUSD Schools Enrollments and Capacities Report, April 10, 2020 (See Appendix K to this IS/ND).*

Table 4.27
Proposed Project Estimated Student Generation

Land Use [a, b]	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Existing Conditions					
Car Wash (7,247 sf))	7 emp	1	0	1	2
General Office (7,236 sf)	29 emp	4	1	2	7
Total Existing Students:		**5**	**1**	**3**	**9**
Proposed Project					
Multi-family Residential	108 du	25	7	14	46
Commercial/Retail	9 emp	1	0	1	2
Total Project Estimated Students:		***26***	***7***	***15***	***48***
Less Existing Students:		*(5)*	*(1)*	*(3)*	*(9)*
Net Total Estimated Students:		**21**	**6**	**12**	**39**

Notes: du = dwelling unit

[a] *Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*

[b] *Table 15 of the 2018 Developer Fee Justification Study provides a rate of 0.2249 students per employee to calculate the total students per non-residential land use. Since the LAUSD Developer Fee Justification Study does not specify different student generation rates for each grade level type for non-residential land uses, the number of students for each grade level type was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of these school development fees, the Proposed Project's potential impact upon public school services would be less than significant.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout

the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Proposed Project is located within a highly urbanized area within the West Los Angeles Community Plan Area. As shown in Table 4.28, there are over 114 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. These facilities range from 0.29-acres (Carthay Circle Park) to 95.8 acres (Cheviot Park).

As discussed in Checklist Question XIV (a), it is estimated that the development of the Proposed Project would result in an increase of 291 new residents to the area. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with approximately 1.25 acres of additional public parkland. The Proposed Project would contribute towards the achievement of such goal through a combination of (1) on-site open space proposed within the Project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area. The Proposed Project would provide approximately 12,600 square feet (0.29 acres) of total common open space and amenities on-site available exclusively to serve Project residents, guests, and patrons. The Proposed Project may include a variety of on-site amenities including, but not limited to, a courtyard, plaza, amenity rooms, roof deck, and private open space.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project would be subject to Ordinance 184,505, which requires the payment of park mitigation fees for residential, non-subdivision projects in the amount of $5,000 per market-rate unit, as adjusted over time. In accordance with Ordinance 184,505, these fees may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. With compliance to Ordinance 184,505 and the provision of on-site open space, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

Table 4.28
Recreation and Park Facilities Within the Project Area

Park Name [a]	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Robertson Recreation Center	1.29	Basketball courts (lighted/outdoor, children's play area, community room, handball courts (lighted), picnic tables, kitchen	0.75
2. Cheviot Hills Park, Pool, and Recreation Center	95.8	Seasonal pool, (outdoor/unheated), barbecue pits, picnic tables, baseball diamond (lighted/unlighted), Dodger Dream Field (unlighted), basketball courts (lighted / indoor), basketball courts (lighted/outdoor), children's play area, auditorium with stage, community rooms, kitchen, pétanque courts, archery range, tennis courts (lighted), seasonal pool (outdoor / unheated)	0.97
3. Irving Schachter Park	0.34	Picnic tables, restrooms	1.04
4. Claude Pepper Senior Citizen Center	0.40	Auditorium, community room, picnic tables, classroom(s), computer lab, kitchen, library, stage	1.29
5. Reynier Park	1.05	Basketball courts (lighted/outdoor), children's play area, picnic tables	1.45
6. Laces Aquatic Center and Recreation Center	7.56	Year-round pool, volleyball courts (lighted), baseball diamond (lighted), basketball courts (lighted/indoor), tennis courts (lighted), basketball courts (lighted/outdoor), dance room, multipurpose sports field, indoor gym (with weights)	1.59
7. Carthay Circle Park	0.29	Garden, open space	1.85
8. Palms Recreation Center	4.85	Auditorium, barbecue pits, basketball courts (lighted/outdoor), children's play area, community room, picnic tables	1.87
9. Media Park	1.09	Open space	1.98
10. Genesee Avenue Park	0.78	Children's play area, open space	1.99
11. Woodbine Park	0.66	Barbecue pits, basketball courts (lighted/outdoor), children's play area, picnic tables	1.99
Total Parkland:	**114.1**		

[a] For a location of the parks identified in this table, see Figure 4.3, Public Services in the Project Vicinity.
Sources: (1) Parks and amenities were based on City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/, accessed August 2019. (2) Park distance and size were estimated using City of Los Angeles Department of Public Works, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 2019.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the

expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The Project Site is served by four LAPL branches.

1. The Robertson Branch Library is the nearest library facility serving the Project Site. It is located at 719 S. Robertson Boulevard, and is approximately 0.7 miles southeast of the Project Site. This Branch Library is approximately 9,035 square feet in size and has a collection size of 49,722 materials. The existing service population of the Robertson Branch Library is 46,710 persons. It is staffed by 9 employees and has approximately 36 volunteers.

2. The Fairfax Branch Library is located at 161 S. Gardner Street, and is approximately 1.8 miles southwest of the Project Site. This Branch Library is approximately 12,500 square feet in size and has a collection size of 38,082 materials. The existing service population of the Fairfax Branch Library is 73,910 persons. It is staffed by 11 employees and has approximately 43 volunteers.

3. The Baldwin Hills Branch Library is located at 2906 S. La Brea Avenue and is approximately 4.4 miles southeast of the Project Site. This Branch Library is approximately 12,000 square feet in size and has a collection size of 32,975 materials. The existing service population of the Baldwin Hills Branch Library is 68,927 persons. It is staffed by 9 employees and has approximately 48 volunteers.

4. The Palms-Rancho Park Branch Library is located at 2920 Overland Avenue and is approximately 2.7 miles southwest of the Project Site. This Branch Library is approximately 10,500 square feet in size and has a collection size of 54,847 materials. The existing service population of the Palms-Rancho Branch Library is 65,731 persons. It is staffed by 11.5 employees and has approximately 79 volunteers. [64]

The LAPL does not currently have plans to expand any of the libraries serving the Project Site area, nor does it currently have plans to construct new libraries in the Project Site vicinity. The Proposed Project would result in an increase of approximately 291 residents. The four libraries

[64] *Los Angeles Public Library, 9500 Pico Boulevard Project, Request for Information, Los Angeles Public Library Response, April 8, 2020.*

serving the Project Site are assumed to currently meet the library demands of the surrounding community and would be able to meet the Proposed Project's demand for library services, because the LAPL is committed to increase the number of people who use the library services, to increase the number of library card holders and actively promote and robustly market programs and services to increase residents' overall engagement with the libraries. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. As described above, these collections included approximately 90,400 e-books, audiobooks, music, and videos through its web-based channels. Library patrons also have access to podcasts, language learning programs, instructional content, and electronic editions of newspapers and magazines through smartphone applications made available to library cardholders. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the need for new or physically altered library facilities, the construction of which would cause significant environmental impacts. Impacts on library facilities during operation of the Proposed Project would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate fire protection services is the responsibility

of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site even after future growth in the immediate area is considered, cumulative impacts upon LAFD services would be less than significant.

Police

With respect to police services, the Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In addition, the Proposed Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site even after future growth in the immediate area is considered, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate police services is the responsibility of the City. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Schools

With respect to cumulative impacts upon schools, the Proposed Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. However, each of the new developments would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Proposed Project in conjunction with related projects could result in an increase in demands upon parks in the area of the Project Site. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Parks and Recreation Fees. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project and related projects would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population, combined with the 291 additional residents generated by the Proposed Project, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. In addition, Measure L, the Public Library Funding Charter Amendment, was approved in March of 2011. Measure L increases the Los Angeles Public Library's share of existing city funds to restore library service hours. Measure L restored operation of the Central Library and eight regional branch libraries on Sundays, and also provided funds to purchase additional books and materials.[65] Moreover, each related project

[65] *City of Los Angeles Public Library, Measure L, website: http://www.lapl.org/measure-l, accessed August 2019.*

would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing library services in the area, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Proposed Project and the related projects. Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Thus, additional residents generated by the Proposed Project and similar subsequent projects would not make a cumulatively considerable impact upon the City's library system. Therefore, the cumulative impacts related to library facilities would be reduced to a less than significant level.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project would include substantial employment or population growth, which would 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. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable,

scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

It is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table 4.28, above, there are 11 existing, new, and recently improved parks within the Project Area totaling more than 114 acres that are available to serve the future residents and retail visitors to the Project Site. In addition, the Proposed Project would provide approximately 12,600 square feet (0.29 acres) of open space that would be available exclusively to serve Project residents, guests, and patrons. The Proposed Project may include a variety of on-site amenities including, but not limited to, a courtyard, plaza, amenity rooms, roof deck, and private open space. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially 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. In addition, the Project Applicant would be required to pay Quimby Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the Project area. Therefore, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 11 existing, new, or recently improved parks within the Project Area totaling more than 114 acres that are available to serve the future residents and retail visitors to the Project Site. The Proposed Project would also provide approximately 12,600 square feet of open space and recreational facilities on-site. As discussed in Section XV (d) above, Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. The related projects that include a residential component would be required to provide on-site open space and pay the Dwelling Unit Construction Tax or Quimby fees to improve recreation and park facilities in the area and to mitigate their impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

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?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☒	☐

The following section summarizes and incorporates by reference the information provided in the Trip Generation Assessment for the 9500 W. Pico Boulevard Mixed-Use Project, City of Los Angeles, prepared by Crain & Associates, dated August 14, 2020 ("Trip Generation Assessment"). The Trip Generation Assessment is provided as Appendix G to this IS/ND.

(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. In accordance with the

City's TAG, a project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be considered to be consistent.

Operational Impacts

Table 4.29, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether operation of the Proposed Project conflicts with the City's circulation system policies. As indicated in Table 4.29, the Proposed Project is in conformance with the applicable policies and programs corresponding to the Proposed Project and would not preclude the City's implementation of any adopted policy and/or program. Therefore, the Proposed Project's operation would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Table 4.29
Questions to Determine Project Applicability to Plans, Policies and Programs

#	Guiding Questions	Response
Existing Plan Applicability		
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? (screening question)	**No Conflict.** The Project Site fronts Pico Boulevard, Beverly Drive, and Reeves Street. Per the Mobility Element 2035, Pico Boulevard is an Avenue I and requires a 100-foot roadway and 70-foot width right-of-way. Beverly Drive is an Avenue I, north of Pico Boulevard, and classified as a Local Street, south of Pico Boulevard (adjacent to the Project Site). Reeves Street is classified as a Local Street. The Project Site is zoned C4-1VL-O with a General Plan land use designation of Neighborhood Commercial. Thus, the Proposed Project would not conflict with the Mobility Plan 2035 street designations.
2	Is the Project Site along any network identified in the City's Mobility Plan?	**No Conflict.** Pico Boulevard is identified as a moderate plus transit enhanced street in the Transit Enhanced Network map, a Tier 3 Bicycle Lane on the Bicycle Lane Network Map, and pedestrian segment in the Pedestrian Enhanced District Map in the Mobility Plan 2035. The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. The Proposed Project would not alter or remove any infrastructure along any of its street frontages in a way that would conflict with any of these designations. As such, the Proposed Project would not conflict with any of the network programs or policies of the Mobility Plan 2035.
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	**No Conflict.** No roadway widening or dedications are required to accommodate the Mobility Plan's roadway requirements for Pico Boulevard adjacent to the Proposed Project. Thus, the Proposed Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
4	Does the Project require placement	**No Conflict.** Two transit benches are located on the

	of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	southwest corner for Pico Boulevard and Beverly Drive, adjacent to the Project Site. The Proposed Project would retain the existing bus stop and transit furniture, and does not require placement of additional transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program. As such, no conflict would occur.
5	Is the Project Site in an Identified Transit Oriented Community?	**No Conflict.** The Project Site is not located within a Transit Oriented Community (TOC) area. The Proposed Project is consistent with the 2020 Connect SoCal policies to develop high density housing in proximity to high quality transit areas and employment centers. As such, the Proposed Project would not conflict with policies associated with TOC areas.
6	Is the Project Site on a roadway identified in the City's High Injury Network?	**No Conflict.** The Project Site is identified in the City's High Injury Network along Pico Boulevard. However, the Proposed Project would comply with the City's Vision Zero Los Angeles Initiative. The Proposed Project would limit vehicular ingress and egress to and from the Project Site to a single driveway along Beverly Drive, the lower designation roadway. This would direct vehicles entering and exiting the Project Site away from Pico Boulevard, reducing potential conflicts with pedestrian and bicyclists traveling along this roadway. Further, the Proposed Project would create a development with sidewalk-facing entrances along the Proposed Project's Pico Boulevard frontage, thus enriching the existing pedestrian/bicyclist experience and activating the block as a pedestrian/bicyclist-safe environment. As such, no conflict would occur.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	**No Conflict**. The Proposed Project would remove and reconfigure the existing westerly driveway on Pico Boulevard to provide a new yellow curb with a 40-foot commercial loading zone on Pico Boulevard. Locating the commercial loading zone on Pico Boulevard is required due to the narrow width and slope of the alley, and circulation conflicts with the adjacent residential parking spaces. The location and configuration of the loading area on Pico Boulevard has been reviewed and conditionally approved by the LADOT. These improvements would be implemented in coordination with LADOT, and thus would not conflict with long-term mobility needs identified in the Mobility Plan 2035.
8	Does the Project propose narrowing or shifting existing sidewalk placement?	**No Conflict**. The Proposed Project would not narrow any existing sidewalks nor shift existing sidewalk placement. The Proposed Project would include a 15-foot sidewalk along Pico Boulevard, a 15-foot sidewalk along Beverly Drive, and a 12-foot sidewalk along Reeves Street, adjacent to the Project Site. These sidewalks would be implemented in coordination with LADOT and thus would not conflict with pedestrian safety.
9	Does the Project propose paving, narrowing, shifting or removing an existing parkway?	**No Conflict**. The Proposed Project does not propose modification of an existing parkway.
10	Does the Project propose modifying, removing, or otherwise	**No Conflict**. The Proposed Project will not modify, remove, or otherwise affect existing bicycle infrastructure.

	affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	
11	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	**No Conflict**. The Project Site is adjacent to an alleyway, which borders the Project Site to the south. This alleyway currently provides access to the surface parking of the Project Site's office building and the multi-family residential buildings to the south of the alleyway. Vehicular access to the Proposed Project's subterranean parking levels would be provided from Beverly Drive. Therefore, the Proposed Project would reduce traffic along the alleyway for the residents to the south. The Proposed Project does not propose to modify, or restrict alley access. As such, no conflict would occur.
12	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	**No Conflict**. The Project Site is not located adjacent to a cul-de-sac. As such, there would be no conflict with the Mobility Plan 2035.
Access: Driveways and Loading		
13	Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	**No Conflict**. Pico Boulevard is classified as an Avenue I arterial in the Mobility Plan 2035. The Proposed Project would remove and reconfigure the existing westerly driveway on Pico Boulevard to provide a new yellow curb with a 40-foot commercial loading zone on Pico Boulevard. Locating the commercial loading zone on Pico Boulevard is required due to the narrow width and slope of the alley, and circulation conflicts with the adjacent residential parking spaces. The location and configuration of the loading area on Pico Boulevard has been reviewed and conditionally approved by the LADOT. Therefore, the Proposed Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
14	If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	**No Conflict.** The Proposed Project would not introduce any new driveways along an arterial. However, the Proposed Project would remove and reconfigure the existing westerly driveway on Pico Boulevard to provide a new yellow curb with a 40-foot commercial loading zone on Pico Boulevard. Locating the commercial loading zone on Pico Boulevard is required due to the narrow width and slope of the alley, and circulation conflicts with the adjacent residential parking spaces. The location and configuration of the loading area on Pico Boulevard has been reviewed and conditionally approved by the LADOT due to the existing site constraints. As such, the Project would not conflict with City policies.
15	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	**No Conflict**. The Project Site is bound by Pico Boulevard, Beverly Drive, Reeves Street, and an alleyway. The Proposed Project would provide a single driveway along Beverly Drive, the lower designation roadway, at the southeast corner of the Project Site. This would direct vehicles entering and exiting the Project Site away from

		Pico Boulevard, reducing potential conflicts with pedestrian and bicyclists traveling along this roadway. Project Site access and driveway design would be designed and developed in consultation with the LADOT, LADBS, and the LAFD, and would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
16	Does the Project propose driveway width in excess of City standard?	**No Conflict**. Per LADOT's Manual of Policies and Procedures, Section 321, it is recommended that two-way driveways serving multi-family residential projects with more than 25 parking spaces are 30 feet in width. The Proposed Project's driveway width is 20 feet wide. A 30 foot driveway is only a recommended width. The Proposed Project would ensure safe internal circulation, with approval from LADOT.
17	Does the Project propose more driveways than required by City maximum standard?	**No Conflict**. The Proposed Project proposes one two-way driveway along Beverly Drive, which is compliant with LADOT's Manual of Policies and Procedures, Section 321.
18	Are loading zones proposed as part of the Project?	**No Conflict**. The Proposed Project will close the existing westerly driveway on Pico Boulevard and will provide a new yellow curb to allow for a 40-foot commercial loading zone on Pico Boulevard. Locating the commercial loading zone on Pico Boulevard is required due to the narrow width and slope of the alley, and circulation conflicts with the adjacent residential parking spaces. The location and configuration of the loading area on Pico Boulevard has been conditionally approved by the LADOT. As such, the Proposed Project would not be in conflict with City policies that recommend loading be located away from arterial streets.
19	Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	**No Conflict**. As discussed above, the Proposed Project proposes a commercial loading and drop-off zone on Pico Boulevard. The proposed loading/drop off zone would replace a former driveway and would not result in the loss of any street parking spaces. Further, the proposed loading/drop off zone has been conditionally approved by the LADOT. As such, the Proposed Project would not be in conflict with City policies that recommend locating drop off zones to the side or rear of the building.
20	Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)?	**No Conflict.** The Project does not propose to modify, limit or remove public access to public right-of-way.
Source: Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, Table 2.1-2: Questions to Determine Project Applicability to Plans, Policies, and Programs, July 2019.		

Construction Impacts

The Proposed Project is anticipated to be constructed over a period of approximately 24 months for completion anticipated in the Year 2023. The construction period would include sub-phases of demolition/site clearing, grading/excavation, building construction, and architectural coatings.

Peak haul truck activity would occur during the grading/excavation phase, and peak worker activity would occur during building construction.

As a standard condition of approval, a detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan would be prepared and submitted to the City and LADOT for review and approval prior to the start of construction activities. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The implementation of a Construction Management Plan in consultation with the LADOT would ensure that the Proposed Project is compliant with City procedures and regulations that address potential transportation impacts due to project construction and would ensure that any traffic impacts from construction of the Proposed Project would be less than significant without mitigation.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Less Than Significant Impact. CEQA Guidelines Section 15064.3(b)(1) states for 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 presumed to have a less than significant transportation impact.

Vehicle-Miles-Traveled Analysis

Following the passage of Senate Bill 743 (SB 743), the State of California's Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under the California Environmental Quality Act (CEQA). These guidelines were intended to shift the transportation performance metric from automobile delay and LOS to one that would promote the reduction of greenhouse gas emissions and the development of multimodal and diverse transportation networks. As a result, OPR determined that, under the proposed update to the CEQA guidelines, vehicle-miles-traveled (VMT) would be established as the primary metric for evaluating environmental and transportation impacts.

Transportation Assessment Screening Criteria

In July 2019, the City of Los Angeles Department of Transportation (LADOT) updated the City's Transportation Assessment Guidelines (the "TAG") to conform to the requirements of Senate Bill 743 (SB 743). The TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act (CEQA) from level of service (LOS) to vehicle miles traveled (VMT) for studies completed within the City. Per the TAG, a Transportation Assessment is required when a project is likely to add 250 or more daily vehicle trips to the local street system. This trip generation assessment has been conducted to determine if the Project

would generate 250 or more net daily vehicle trips and would, thereby, require the preparation of a Transportation Assessment.

The City has updated the TAG to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. The TAG sets the following criterion for determining significant transportation impacts based on VMT:

> *For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?*

To assist in determining which development projects would conflict with CEQA Guidelines section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate whether further analysis of a land use project's impact based on VMT is required. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.

2. The project would generate a net increase in daily VMT.

Net Project Trip Generation Assessment

Due to the unique nature of the Proposed Project's existing uses, the net Project trip generation was calculated using two approaches: (1) using the LADOT VMT Calculator Version 1.3, and (2) based on trip generation rates from the Institute of Transportation Engineers (ITE), the LADOT, and the San Diego Association of Governments (SANDAG). The methodology and results of these two approaches are summarized below.

Along with the updated TAG, LADOT developed the City of Los Angeles VMT Calculator Version 1.3 (the "VMT Calculator"), which calculates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator utilizes average daily trip generation rates from the ITE Trip Generation Manual, 9th Edition, 2012 and empirical trip generation data to determine the base daily trips associated with a land use project. The number of daily trips is further refined using data from the Environmental Protection Agency's (EPA's) Mixed-Use (MXD) Model and the City's Travel Demand Forecasting (TDF) Model.

The VMT Calculator was utilized to determine the net daily trip generation for the Proposed Project. The VMT Calculator contains a set of land-use categories with trip generation rates and corresponding trip type data that can be chosen as best matching a project's characteristics. For the Proposed Project and existing site land uses, the trip generation rates and trip type percentages for the most similar land uses were applied in the VMT Calculator.

As shown in Attachment A of the Trip Generation Assessment, the Housing (Multi-Family), Housing (Affordable Housing – Family), and Retail (High-Turnover Sit-Down Restaurant) land

use rates were applied to the corresponding Proposed Project uses. The Office (General Office) land use rates were applied to the existing office uses. However, the VMT Calculator does not provide trip generation rates for the existing car wash use. Thus, for screening purposes, the custom land use feature was used to estimate the daily trips and daily VMT for the existing car wash use. Data specific to the car wash use were inputted into the VMT Calculator in order to determine the daily VMT contribution of this use. This data included the number of daily trips, the number of employees, and the trip purpose splits for the car wash use. This use was assumed to generate 900 daily trips (calculated using SANDAG trip generation rates, as presented in Attachment 2) and employ approximately 16 workers on any given days. The trip purpose splits that were inputted into the VMT Calculator were taken from Appendix E of the City of Los Angeles VMT Calculator Documentation (November 2019), which presents the land use trip purpose assumptions for the various land use rates within the VMT Calculator. The trip purpose splits for the car wash land use were assumed to correspond with the trip purpose splits for the Auto Repair land use, as this is the most similar land use available in the VMT Calculator. As shown, based on the VMT Calculator, the Proposed Project would generate two (2) net daily vehicle trips and a decrease of 374 net daily VMT (proposed minus existing).

ITE, LADOT, and SANDAG Trip Generation Rates

Traffic-generating characteristics of many land uses, including the residential uses proposed for the Proposed Project, have been surveyed and documented in studies conducted under the auspices of ITE. This information is available in the manual, Trip Generation, 10th Edition, 2017, published by ITE. The trip generation rates in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Los Angeles and the surrounding region. In addition, the LADOT has developed affordable housing trip generation rates from vehicle trip count data collected at affordable housing sites in the City in 2016. As the ITE manual does not provide daily or AM peak hour trip generation rates for the car wash use, rates published by SANDAG were employed in the trip generation calculation.

For this analysis, the ITE Trip Generation rates, the LADOT survey-based trip generation rates, and the SANDAG rates, provided in Attachment 2 of the Trip Generation Assessment, were used to determine the daily, AM and PM peak-hour trips generated by the proposed site uses. The rates used to calculate the Proposed Project trip generation present a conservative condition, as these rates do not account for such trip-reducing factors as multi-purpose trips, extensive transit, bicycle, walking trips, or pass-by trips. These factors play a significant role in determining the actual traffic generating characteristics of a particular Project, and therefore, adjustments to the traffic generation estimates were deemed appropriate.

Trip reductions related to the Proposed Project are expected to occur as a result of “multi-purpose” or “internal” trips within the Project Site. This type of trip generally occurs at integrated “mixed-use” developments containing a variety of uses. For example, in this case, some of the residents of the building are expected to use the onsite restaurant use, thereby reducing some of the trips that this use would otherwise generate. Thus, the advantages of a mixed-use Project need to be considered for reasonable evaluation of the trip-making potential of such a Project.

The use of alternative modes of transportation that include public transportation, bicycling, and walking is an important consideration in the evaluation of the Proposed Project's trip making potential. These modes of transport are not accounted for in the ITE trip generation rates; therefore, appropriate adjustments were made to the Project trip generation to account for these trips.

Trip reduction factors for the Proposed Project also account for the presence of "pass-by" trips. These are trips that are due to an intermediate stop at the Project Site during an existing or previously planned trip. These intermediate stops may be for a planned purpose (such as a visit to a retail store on the way home from work), or they may be spur-of-the-moment "impulse" trips. Accounting for these adjustments more realistically reflects the fact that some trips related to the Proposed Project would be multi-purpose trips and some Project trips are already on the street system for another purpose. These trips, therefore, are not contributing additional traffic to the surrounding roadway network.

The differentiation between pass-by trips versus transit trips is important with regard to the assessment of potential Project traffic impacts at intersections adjacent to the Project Site. Per the LADOT traffic study policies and procedures, the pass-by type of trip discount is not appropriate for application to the site driveways or site adjacent intersections. These vehicle trips would eventually travel past the Project Site (and through the site adjacent intersections) and are not "eliminated" due to the existence of the Proposed Project. However, the trip ends to and from the Project Site do not represent new vehicle trips at area intersections. Transit trips, on the other hand, do not represent vehicle trips at the Project driveways. While this type of person trip is not "eliminated" by the Proposed Project's development, no private vehicle trip is generated as the trip occurs by walking or by transit. Thus, the Project Site would serve the same number of patrons, but generate fewer vehicle trips. A summary of the "baseline" trip generation adjustment factors are presented in Table 4.30.

Table 4.30
Project Trip Adjustment Factors

Land Use	Transit/Bicycle/Walk-In Usage	Pass-By Trips
Residential	10%	0%
Commercial	10%	20%
Office (to be removed)	10%	0%
Car Wash (to be removed)	0%	20%

Source: Crain and Associates, Trip Generation Assessment for the 9500 W. Pico Boulevard Residential Project, City of Los Angeles, August 14, 2020 (see Appendix G to this IS/ND).

The results of the Project trip generation calculations, including adjustments for internal capture, transit/bicycle/walk-in, and pass-by trips are summarized in Table 4.31. As shown in Table 4.31, it is estimated that the net Proposed Project would generate a net decrease of approximately 23 AM and a decrease of 7 PM peak-hour trips at area intersections.

Per the TAG, a Transportation Assessment is required when a project is likely to add 250 or more net daily vehicle trips to the local street system. Given that the Proposed Project is estimated to generate two (2) net daily vehicle trips to the local street system on a typical weekday, the Proposed Project is not expected to result in significant impacts to the surrounding transportation system. Therefore, neither a Transportation Assessment nor further analysis of transportation impacts is required for the Proposed Project. The Proposed Project would not generate more than 250 net daily trips and would not meet the first screening criteria requiring additional VMT analysis or Transportation Assessment. Thus, the Proposed Project is not expected to have a significant VMT impact, and impacts would be less than significant.

c) 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. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features.

Table 4.31
Project Trip Generation Estimates

Land Use	Size	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total [b]
Proposed Uses							
Apartment (ITE 221)	95 du	9	25	34	26	16	42
Affordable Units	13 du	3	4	7	3	3	6
High-Turnover Sit-Down Restaurant (ITE 932)	4,500 sf	25	20	45	27	17	44
Subtotal Proposed Trips:		***37***	***49***	***86***	***56***	***36***	***92***
Internal Trips [a]							
Apartment		(1)	(4)	(5)	(3)	(3)	(6)
Affordable Units		0	(1)	(1)	0	(1)	(1)
High-Turnover Sit-Down Restaurant		(5)	(1)	(6)	(4)	(3)	(7)
Subtotal Internal Trips:		***(6)***	***(6)***	***(12)***	***(7)***	***(7)***	***(14)***
Transit/Walk-in Trips							
Apartment	10%	(1)	(2)	(3)	(2)	(2)	(4)
Affordable Units	10%	0	(1)	(1)	0	(1)	(1)
High-Turnover Sit-Down Restaurant	10%	(2)	(2)	(4)	(2)	(2)	(4)
Subtotal Transit/Walk-in Trips:		***(3)***	***(5)***	***(8)***	***(4)***	***(5)***	***(9)***
Total Driveway/Adjusted Internal Trips:		***28***	***38***	***66***	***45***	***24***	***69***
Pass-by Trips							
Apartment	0%	0	0	0	0	0	0
Affordable Units	0%	0	0	0	0	0	0
High-Turnover Sit-Down Restaurant	20%	(4)	(3)	(7)	(4)	(3)	(7)
Subtotal Pass-by Trips:		***(4)***	***(3)***	***(7)***	***(4)***	***(3)***	***(7)***
Total Area Intersection Trips (Proposed Uses):		**24**	**35**	**59**	**41**	**21**	**62**
Existing Trip Generation (to be removed)							
Office (ITE 710)	7.236 ksf	7	1	8	1	7	8
Car Wash (ITE 948)	1 tunnel	18	18	36	39	39	79
Subtotal Existing Trips:		***25***	***19***	***44***	***40***	***46***	***86***
Transit/Walk-in Trips							
Office	10%	(1)	0	(1)	0	(1)	(1)
Car Wash	0%	0	0	0	0	0	0
Subtotal Transit/Walk-in Trips:		***(1)***	***0***	***(1)***	***0***	***(1)***	***(1)***
Total Driveway/Adjusted Internal Trips:		***24***	***19***	***43***	***40***	***45***	***85***
Pass-by Trips							
Office	0%	0	0	0	0	0	0
Car Wash	20%	(4)	(3)	(7)	(8)	(8)	(16)
Subtotal Pass-by Trips:		***(4)***	***(3)***	***(7)***	***(8)***	***(8)***	***(16)***
Total Area Intersection Trips (Existing Uses):		***20***	***16***	***36***	***32***	***37***	***69***
Net Project Trip Generation							
Total Driveway/Adjacent Intersection Trips:		**4**	**19**	**23**	**5**	**-21**	**-16**
Total Area Intersection Trips (Net Project):		**4**	**19**	**23**	**9**	**-16**	**-7**

Notes:

[a] *Unconstrained internal person trip capture rates for trip origins and trip destinations from the ITE Trip Generation Handbook(3rd Edition, 2017) assumed for vehicle trip capture between the proposed and existing project uses. The lower internal trip total from the separate trip origin and trip destination calculations was utilized for each pair of land uses sharing trips.*

Source: Crain and Associates, Trip Generation Assessment for the 9500 W. Pico Boulevard Mixed-Use Project, City of Los Angeles, August 14, 2020 (see Appendix G to this IS/ND).

Current vehicular access is provided by two driveways along Pico Boulevard, two driveways along Beverly Drive, and the alleyway, which provides access to the office building on the Project Site. The Proposed Project would provide one full-access driveway from Beverly Drive, which provides direct access to the subterranean parking garage. The width of the driveways would conform to LADOT minimum standards for a multi-family residential driveway and include a single inbound and single outbound travel lane. The circulation aisle widths of the parking areas are designed to allow adequate and safe circulation of vehicles without significant conflicts and conform to LADOT parking aisle width standards. The Proposed Project would not introduce new driveways with vehicular access to the Project Site, since a vehicular driveway exists where the Proposed Project's driveway is proposed. Therefore, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section VIII(g), the Project Site is not located in a disaster route according to the Los Angeles West Area Disaster Route Map of Los Angeles County.[66] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[67] Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Further, emergency vehicle drivers 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. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and impacts would be less than significant.

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[66] *Los Angeles County Department of Public Works, City of Los Angeles West Area Disaster Route Map, August 13, 2008.*

[67] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the West Los Angeles Community Plan Area. In accordance with the methodology outlined in the City's TAG, long-term, or cumulative, traffic 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 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, 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.[68] This is because 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. As noted in Question XVII(b), above, the Proposed Project's increase in VMT would be less than the threshold for a significant impact to occur, and the Proposed Project's contribution to cumulative VMT impacts is less than significant and would not be cumulatively considerable. Additionally, similar related projects would most likely be infill development, and thus would similarly promote transit use, reduce VMT, and not conflict with a program, plan, ordinance or policy addressing the circulation system. Further, all subsequent related projects would be individually evaluated, and any potential traffic impacts would be mitigated on a case-by-case basis, if necessary. Thus, the Proposed Project's cumulative traffic impacts, in connection with other related projects, would be less than significant. Therefore, the Proposed Project's cumulative transportation impact is considered 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:

[68] *City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, page 2-10, July 2020.*

	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	☐	☐	☒	☐
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.	☐	☐	☒	☐

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 Impact. As discussed in response to Checklist Question V.b (Cultural Resources, Archeological Resources), a records search was conducted with the South Central Coastal Information Center (SCCIC) to identify whether any known historic built resources, archaeological resources or archaeological survey areas occur on the Project Site or within the Project Site vicinity. The SCCIC records search (dated October 15, 2019 and provided in Appendix H.1 to this IS/ND) identified no archaeological resources within the Project Site boundaries. The archaeological sensitivity of the Project Site is unknown because there are no previous studies for the Project Site. Additionally, the natural ground-surface appears to be obscured by urban development; consequently, surface artifacts would not be visible during a survey. While there are currently no recorded archaeological sites within the Project Site area, buried resources could potentially be unearthed during project activities. As noted above, the Proposed Project would require excavations to a maximum depth of approximately 22 feet below grade for the two levels of subterranean parking. As such, it is possible that unknown tribal cultural resources could be discovered during construction of the Proposed Project, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Public Resources Code Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project would cause a substantial

adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource 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), or if such resource is 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. Public Resources Code 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question V(b) (Cultural Resources, Archeological Resources), the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[69] The Project Site is located in a highly urbanized area of the West Los Angeles Community Plan Area of the City of Los Angeles, and has been partially disturbed by past development activities along with associated control/maintenance of the existing buildings. The Proposed Project would involve the grading of 21,040 cy of soil export. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, it is recommended that the City's standard condition of approval for addressing inadvertent discoveries of tribal cultural resources be incorporated into the Proposed Project's approval. The City's standard condition of approval requires that upon any discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Proposed Project and the Department of City Planning. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbing activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth in the City's standard conditions of approval. With the implementation of regulatory compliance measures described in Section V(b) and the City's standard conditions of approval for

[69] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

addressing inadvertent discoveries of archaeological or tribal cultural resources, potential impacts to tribal cultural resources would be less than significant without mitigation.

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 Impact. The Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Pursuant to the procedures imposed by AB 52, pre-consultation request letters were sent on January 14, 2021 to local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects. The City of Los Angeles received one response and request for consultation from the Gabrieleno Band of Mission Indians – Kizh Nation on February 4, 2021; however, upon further evaluation of the Proposed Project, this tribe stated on March 23, 2021 that no further consultation or discussion is necessary regarding the Proposed Project.

A Sacred Lands File Search (SLFS) was also conducted with the Native American Heritage Commission (NAHC), a State-level agency established in 1976 which identifies, catalogs, and protects Native American cultural resources -- ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California. The NAHC is also charged with ensuring California Native American tribes' accessibility to ancient Native American cultural resources on public lands, overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the California Native American Graves Protection and Repatriation Act (CalNAGPRA), among many other powers and duties. The SLFS yielded a positive result, with a recommendation to contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians tribe for further information. However, this tribe did not request a consultation; the City of Los Angeles also sent a follow-up email and telephone call, with no responses.

As the Project Site is located within the ancestral tribal territory of the Gabrieleno Band of Mission Indians – Kizh Nation, it is unlikely that any other tribe would have significant information indicating substantial evidence of potential impacts to cultural or tribal resources. Based on the Project Site's prior soil disturbance and lack of any known Native American resources or cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native

American Tribe is considered low. With the regulatory compliance measures referenced above, impacts to tribal cultural resources remain less than significant during Project construction.

Cumulative Impacts

Less Than Significant Impact. As indicated above, the Project Site does not contain any known tribal cultural resources, nor did search results by the SCCIC or the Assembly Bill 52 consultation process provide substantial evidence as to the presence of tribal cultural resources on site. Additionally, compliance with standard conditions of approval and regulatory requirements would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. It is unknown whether or not any of the properties on which the related projects are located contain tribal cultural resources. However, similar to the Proposed Project, each of the related projects would be required to follow the regulatory requirements of Assembly Bill 52, as applicable, which includes notifying tribes to solicit consultation and to analyze and mitigate potential impact of tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with conditions of approval and/or site specific mitigation measures to avoid or substantially lessen potential impacts. Therefore, cumulative impacts would be less than significant.

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?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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?

Less Than Significant Impact. A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts. The determination of whether a project results in a significant impact on water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities shall be made considering the following factors: (a) the total estimated demand for the project; (b) whether sufficient capacity exists in the infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and (c) whether improvements or upgrades necessary to serve the project would result in significant environmental impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). [70] In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an

[70] *U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization—-oxygen-plant-replacement, accessed August 2019.*

average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd, which may fluctuate depending on the season.[71]

As shown in Table 4.32, the Proposed Project would generate a net decrease in water demand of approximately 26,387 gallons per day (gpd) of water, since the Proposed Project would replace an existing car wash, which typically has a high water demand. Additionally, because the Proposed Project's housing and population growth is within SCAG's forecast, the Proposed Project's increased water demand would not measurably reduce the LAAFP's capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Based on correspondence with LADWP, water mains that serve the Project Site include an existing 8-inch diameter pipe along Beverly Drive, a 6-inch diameter pipe along Pico Boulevard, and a 6-inch diameter pipe along Reeves Street. There are no known water service problems or deficiencies in the area. LADWP concluded that LADWP should be able to provide the domestic needs of the proposed Project from the existing water service. LADWP cannot determine the impact on the existing water system until the fire demands of the Proposed Project are known. Until that determination has been made, LADWP would assess the need for additional facilities, if needed.[72] Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

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[71] *Los Angeles Department of Water and Power, Water, L.A.'s Drinking Water Quality Report, website: http://www.ladwp.com/, accessed August 2019.*

[72] *Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, 9500 Pico Mixed-Use Project, March 30, 2020 (See Appendix K to this IS/ND).*

Table 4.32
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Conditions (To Be Removed)			
Car Wash (1 tunnel)	900 vehicles	43 gpv	38,700 [b]
Office	7,236 sf	0.12 gpd/sf	868
		Total Existing Water Demand:	***39,568***
Proposed Project			
Residential: Studio	35 du	75 gpd/du	2,625
Residential: One-bedroom	51 du	110 gpd/du	5,610
Residential: Two-bedroom	16 du	150 gpd/du	2,400
Residential: Three-bedroom	6 du	190 gpd/du	1,140
Restaurant (1,000 sf)	45 seats	30 gpd/seat	1,350
Retail	2,250 sf	0.025 gpd/sf	56
		Total Proposed Project Water Demand:	***13,181***
		Less Existing Water Demand:	*-39,568*
		NET Project Site Water Demand:	**-26,387**

Notes: du= dwelling units; sf=square feet; gpd= gallons per day; gpv = gallons per vehicle

[a] *Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012. It is assumed that all water usage would convert to wastewater.*

[b] *Consumption from car wash assumes 43 gallons per vehicle and 900 trips per day from Transportation Report. Source for average gpv: International Car Wash Association, Water use in the Professional Car Wash Industry, September 2002.*

[c] *Restaurant assumes 2/3 of area would be designated for seating area (approximately 15 square feet per seat) and 1/3 area designated for back-of-house and kitchen space.*

Parker Environmental Consultants, 2020.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project Site area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to

accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[73] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 4.33 below, the Proposed Project would generate a net decrease of approximately 26,387 gpd of wastewater, compared to existing conditions.

Table 4.33
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Conditions (to be removed)			
Car Wash (1 tunnel)	900 vehicles	43 gpv	38,700 [b]
Office	7,236 sf	0.12 gpd/sf	868
		Total Existing Wastewater Generation:	***39,568***
Proposed Project			
Residential: Studio	35 du	75 gpd/du	2,625
Residential: One-bedroom	51 du	110 gpd/du	5,610
Residential: Two-bedroom	16 du	150 gpd/du	2,400
Residential: Three-bedroom	6 du	190 gpd/du	1,140
Restaurant (1,000 sf)	45 seats	30 gpd/seat	1,350
Retail	2,250 sf	0.025 gpd/sf	56
		Total Proposed Project Wastewater Generation:	***13,181***
		Less Existing Wastewater Generation:	*-39,568*
		NET Project Site Wastewater Generation:	**-26,387**

Notes: du= dwelling units; sf=square feet; gpd= gallons per day; gpv = gallons per vehicle

[a] *Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012.*

[b] *Consumption from car wash assumes 43 gallons per vehicle and 900 trips per day from Transportation Report. Source for average gpv: International Car Wash Association, Water use in the Professional Car Wash Industry, September 2002.*

Parker Environmental Consultants, 2020.

Based on the Bureau of Sanitation Wastewater Services Information Letter, the sewer lines serving the Project Site are adequate to serve the Proposed Project.[74] The Applicant would be required to submit a SCAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation (BOS) will re-verify the

[73] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed August 2019.*

[74] *Bureau of Sanitation, 9500 Pico Mixed-Use Project – Request for Wastewater Services Information, February 12, 2020 (see Appendix K to this IS/ND).*

gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Proposed Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Impacts to sewer capacity and infrastructure would be less than significant. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

Stormwater Drainage Facilities

As described in Question X(c), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with a car wash, food stand, and office building. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question X(a), the Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts to stormwater drainage facilities would be considered less than significant.

Electricity Infrastructure

Based on correspondence with LADWP, there are four underground 34.5 kilovolt (kV) circuits that run adjacent to the Project Site along Pico Boulevard, one underground 4.8 kV circuit that runs adjacent to the Project Site along Reeves Street and the alleyway in the rear of the property, and one overhead 4.8 kV circuit that runs adjacent to the Project along Reeves Street and the alleyway in the rear of the property.[75] The Proposed project would require on-site transportation and may require underground line extensions on public streets. The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be

[75] *Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, 9500 Pico Mixed-Use Project, March 30, 2020 (See Appendix K to this IS/ND).*

determined as site plans are finalized), the Project Applicant may be financially responsible for some infrastructure improvements necessary to serve the Proposed Project (e.g. installation of electric power facilities or service connections or adding a line extension on the public street). New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when connecting the Proposed Project.

Additionally, as discussed in Question VI(a) above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Proposed Project would be part of the total load growth forecast for the City of Los Angeles 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 Power SLTRP incorporates the estimated power requirement for the Proposed Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Based on Appendix A of LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2022-2023 fiscal year (the Proposed Project's buildout year) would be 22,802 GWh of electricity. As such, the Proposed Project's estimated annual usage 579,386 kWh would be a small fraction of one percent of LADWP's projected sales for 2023. Electricity supplies from LADWP are adequate to serve the Proposed Project, and any improvements to existing infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the Proposed Project impacts to local and regional electricity supplies and existing electrical facilities would be less than significant.

Natural Gas

The Southern California Gas Company manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g. pressure betterments, natural gas supplies) would need to be initiated to solve problems. It is anticipated that the SCG would be able to meet the natural gas demands of the Proposed Project; however, a natural gas survey of equipment would be completed to identify if the current infrastructure would sustain the demand for the Proposed Project. Further, since natural gas supplies vary with time, the Southern California Gas Company's ability to accommodate Proposed Project's demand for natural gas supplies can only be evaluated when the Proposed Project is approved.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Proposed Project would not require extensive infrastructure improvements 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 Proposed Project. The Proposed Project would however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. "Hooking-up" disruptions cannot be determined until the actual natural gas demand is known. However, impacts associated with

utility upgrades or additional connections would be temporary in nature and would not require new supply facilities.

As estimated above in Section VI, Energy, the Proposed Project's net natural gas demands are estimated to be approximately 967,393 cubic feet (cf) per year. The natural gas consumption of almost 1 million cubic feet per year would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be well within the SCG's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. The operation of the Proposed Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the proposed Project would result in a less than significant impact to natural gas infrastructure capacity.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 4.32, the Proposed Project would decrease the water consumption at the Project Site, when compared to existing conditions. Through the 2015 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed

the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low-flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184,248, Los Angeles Ordinance No. 184,692, the 2020 Los Angeles Plumbing Code, the 2019 California Green Building Standards Code (CAL Green) and the 2020 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181,288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section XIV, Population and Housing, the Proposed Project's population and employment growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. As such, the additional water demands generated by the Proposed Project and similar subsequent projects are accounted for in the 2015 Urban Water Management Plan. Therefore, cumulative impacts with regards to water supply will be less than significant.

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?

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XIX(b), above, the sewage flow will ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project.[76] Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on HWRP's capacity.

Local Wastewater Generation

Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since all subsequent projects, like the Proposed Project, would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project and future similar projects would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

[76] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: https://www.lacitysan.org, accessed August 2019.*

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?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.[77] State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[78]

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated

[77] *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

[78] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

In 2017, the City of Los Angeles entered into exclusive franchise agreements with waste haulers to provide solid waste, commingled recyclables, and organics collection, transfer, disposal and processing services to commercial and multifamily establishments in the City. The companies that were awarded the contract for each franchise secured a dedicated waste stream, increasing the financial viability to develop new organic waste processing and conversion technology facilities in the vicinity of the City of Los Angeles. The Project Site is located within the West Los Angeles Commercial Waste Franchise Zone, which is serviced under contract to Athens Services. Under the existing contract, the service provider is required to deliver solid waste resources collected to the following certified facilities: the Athens Sun Valley Materials Recovery Facility, located at 11121 Pendleton Street and the Chiquita Canyon Landfill, located at 29201 Henry Mayo Drive. All solid waste is disposed to the Athens Sun Valley Materials Recovery Facility. Then all trash and non-recyclables materials are transferred to a landfill that accepts non-recyclable waste. It is assumed that the Proposed Project's solid waste would be disposed of at the Chiquita Canyon Landfill. The Chiquita Canyon Landfill has a remaining capacity of 59.7 million tons and has an estimated remaining life of 29 years.[79]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided in Table 4.34, it is estimated that the proposed construction activities would generate approximately 1,768 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant's contractor would be required to obtain an AB 939 Compliance Permit from the Bureau of Sanitation certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility.

[79] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019.*

Table 4.34
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a]	Generated Waste (tons)
Demolition			
Commercial/Office	14,483 sf	155 lbs/sf	1,122
Asphalt	15,000 sf [b]	2,400 lbs/cy	333
		Total Demolition Debris:	***1,455***
Construction			
Residential	93,621 sf	4.38 lbs/sf	205
Commercial	3,250 sf	3.89 lbs/sf	6
Parking, Storage, and Utility	52,595 sf	3.89 lbs/sf	102
		Total Construction Debris:	***313***
		Total Construction and Demolition Debris:	**1,768**

Notes: sf= square feet; cy = cubic yards
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *It is assumed existing asphalt would be approximately ½-foot beneath grade.*
Source: Parker Environmental Consultants, 2020.

As shown in Table 4.35, below, Estimated Operational Solid Waste Generation, the Proposed Project's net increase in solid waste generation during operation of the Proposed Project would be 1,037 pounds per day or approximately 189 tons per year. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

The Proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure and is within the available capacities of area landfills. Therefore, the Proposed Project's impacts to solid waste generation would be less than significant.

Table 4.35
Expected Operational Solid Waste Generation

Type of Use	Size [a]	Solid Waste Generation Rate [b] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Conditions (to be removed)			
Car Wash (7,247 sf)	7 emp	10.53 lbs/employee	74
General Office (7,236 sf)	29 emp	10.53 lbs/employee	305
Subtotal Existing Solid Waste Generation:			***379***
Proposed Project			
Residential	108 du	12.23 lbs/du/day	1,321
Commercial/Retail	9 emp	10.53 lbs/employee	95
Subtotal Project Solid Waste Generation:			***1,416***
Less Existing Solid Waste Generation:			*-379*
Net Total Project Solid Waste Generation:			**1,037**

Notes: du = dwelling unit; sf = square feet; emp = employee
[a] *Employee generation for existing and proposed uses are based on LADOT's City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1, May 2020.*
[b] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
Source: Parker Environmental Consultants, 2020.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and

environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Proposed Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Proposed Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2018 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 176.1 million tons in the year 2033 will exceed the 2018 remaining permitted Class III landfill capacity of 163.4 million tons.[80] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing

[80] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, page 39, December 2019.*

infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with the Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[81] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as future projects become even more sustainable and increase waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

[81] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Responses a through d: No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Proposed Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

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	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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?

Less Than Significant Impact. A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no significant impacts with respect to biological resources or California's history or pre-history. As noted in the analysis above, the site is developed with a car wash and office building and does not support any substantial habitat of a fish or wildlife species. Vegetation on the site is limited to ornamental trees on-site. Compliance with standard regulatory compliance measures and standard conditions of approval would reduce to a less than significant impact level the potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

Additionally, although no known direct impacts to historic resources are anticipated, implementation of the standard conditions of approval discussed above and compliance with existing regulations would ensure any impacts upon cultural resources are reduced to a less than significant level in the unlikely event any such historic, or archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the area of the Proposed Project, therefore, should be monitored closely to

quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance measures and standard conditions of approval discussed above, any impacts to paleontological resources would be reduced to a less-than-significant level. Therefore, with implementation of standard conditions of approval and adherence to regulatory compliance measures, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

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. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the cumulative impact analysis provided under each Checklist Question above, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation.

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2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles

CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code

LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commision
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter

$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons

TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System