LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

New Beatrice West Project

Case Number: ENV-2020-3533-EIR

Project Location: 12541 West Beatrice Street, 12575 West Beatrice Street, 12553–12575 West Beatrice Street, and 5410–5454 South Jandy Place, Los Angeles, California 90066

Community Plan Area: Palms–Mar Vista–Del Rey

Council District: 11—Mike Bonin

Project Description: The Project includes the construction of an eight-story, 199,500-square-foot office building with 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The Project is proposed on a 196,463-square-foot (4.51-acre) site located at 12575 W. Beatrice Street, 12553–12575 W. Beatrice Street, and 5410–5454 S. Jandy Place (identified herein as 12575 W. Beatrice Street) and 12541 W. Beatrice Street (collectively, Project site). The Project site is currently occupied with a 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and an 87,881-square-foot office building at 12541 W. Beatrice Street. As part of the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained. The Project would adjust existing lot lines to accommodate a corner landscaped parcel, a building site for the construction of the proposed new building (at 12575 W. Beatrice Street), and a parcel for the existing building (at 12541 W. Beatrice Street). As a result, the lot line adjustment would create a 103,281-square-foot (2.37-acre) lot at 12575 W. Beatrice Street and a 93,182-square-foot (2.14-acre) lot at 12541 W. Beatrice Street. An approximately 389-square-foot lot would also be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes.

The Project would provide 811 parking spaces, fulfilling the requirements of the Los Angeles Municipal Code. The majority of the parking spaces (791 spaces) would be provided in a five-level parking structure, including three levels above grade and two subterranean levels, with the remaining spaces (20 spaces) provided in a surface parking area. The Project would include landscaped courtyards and walkways to connect and integrate the proposed building with the office building to remain to create an integrated creative office campus. The Project would provide approximately 38,033 square feet of landscape throughout the Project site. Construction of the Project is anticipated to be completed in 2024.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
NSB Associates

December 2020

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1 INTRODUCTION

The Project was previously considered and approved by the City of Los Angeles (City) under Case No. CPC-2016-1208-CU-SPR, which was approved by the City Planning Commission on August 18, 2017, and Case No. AA-2017-397-PMEX, which was approved by the Advisory Agency on June 7, 2018. To comply with the California Environmental Quality Act (Public Resources Code Section 21000 et seq.) (CEQA), the City prepared and adopted a mitigated negative declaration (Case No. ENV-2016-1209-MND). Two appeals were filed and heard by the City. The appeal of Case No. CPC-2016-1208-CU-SPR was denied by the City Council on February 7, 2018; and the appeal of Case No. AA-2017-397-PMEX was denied by the City Planning Commission on November 19, 2018.

Subsequently, two petitions for writ of mandate were filed and consolidated challenging the City's approvals of the Project, on the grounds, among others, that the City's mitigated negative declaration was inadequate under CEQA (*Karney Management v. City of Los Angeles*, Case No. BS172677 [Consolidated with Case No. 18STCP03226]). The Honorable John A. Torribio of the Los Angeles County Superior Court ruled that the mitigated negative declaration was inadequate as to aesthetics, noise and traffic. On January 21, 2020, the court entered a judgment granting the petition for writ of mandate as to the CEQA cause of action, and denying the remainder of the causes of action. The judgment vacates the City's approval of the mitigated negative declaration and requires that an environmental impact report (EIR) be prepared for the Project. However, the judgment does not invalidate the underlying approvals (i.e., CPC-2016-1208-CU-SPR and AA-2017-397-PMEX) which remain valid.

The City of Los Angeles, as Lead Agency is preparing this Initial Study pursuant to CEQA and the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677 (Consolidated with Case No. 18STCP03226). For purposes of this Initial Study, the Project is analyzed in the context existing prior to the adoption of any Project approvals or entitlements by the City. Thus, the impacts of the Project's discretionary approvals will be considered.

This Initial Study evaluates the potential environmental effects that could result from the approval, construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA, the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (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 shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1] As described above, the City is required to prepare an EIR pursuant to the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

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[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (https://resources.ca.gov/admin/Legal).

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study has determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for a proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or any revisions to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the Project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**New Beatrice West Project**
ENVIRONMENTAL CASE NO.	ENV-2020-3533-EIR
RELATED CASES	CPC-2016-1208-CU-SPR, AA-2017-397-PMEX, ENV-2016-1209-MND

PROJECT LOCATION	12541 West Beatrice Street, 12575 West Beatrice Street, 12553–12575 West Beatrice Street, and 5410–5454 South Jandy Place
COMMUNITY PLAN AREA	Palms–Mar Vista–Del Rey
GENERAL PLAN DESIGNATION	Light Industrial
ZONING	M2-1
COUNCIL DISTRICT	11

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
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PHONE NUMBER	(310) 282-6254

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 & 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

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.

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.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The New Beatrice West Project (Project) includes the construction of a new eight-story office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space.[2] The Project is proposed on a 196,463-square-foot (4.51-acre) site located at 12575 W. Beatrice Street, 12553–12575 W. Beatrice Street, and 5410–5454 S. Jandy Place (identified herein as 12575 W. Beatrice Street) and 12541 W. Beatrice Street (collectively, Project site) in the Palms–Mar Vista–Del Rey Community Plan area of the City of Los Angeles (City). The Project site is currently occupied with a 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and an 87,881-square-foot office building at 12541 W. Beatrice Street. As part of the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained. As part of the Project, the existing property lot lines would be adjusted to accommodate a corner landscaped parcel, a building site for the construction of the proposed new building (at 12575 W. Beatrice Street, 12553–12575 W. Beatrice Street, and 5410–5454 S. Jandy Place), and a parcel for the existing building (12541 W. Beatrice Street). When the lot line adjustment is complete, the lot at 12575 W. Beatrice Street would contain approximately 103,281 square feet (2.37 acres) and the lot at 12541 W. Beatrice Street would contain approximately 93,182 square feet (2.14 acres). An approximately 389-square-foot lot would also be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes.

The Project would provide 811 parking spaces, fulfilling the requirements of the Los Angeles Municipal Code (LAMC). The majority of the parking spaces (791 spaces) would be provided in five levels of structured parking, including three levels above grade and two subterranean levels, with the remaining spaces (20 spaces) provided in a surface parking area. The Project would include landscaped courtyards and walkways to connect and integrate the proposed building with the office building to remain to create an integrated creative office campus. The Project would provide approximately 38,033 square feet of landscaping throughout the Project site. Construction of the Project is anticipated to be completed in 2024.

The Project was previously considered and approved by the City under Case No. CPC-2016-1208-CU-SPR, which was approved by the City Planning Commission on August 18, 2017, and Case No. AA-2017-397-PMEX, which was approved by the Advisory Agency on June 7, 2018. To comply with CEQA, the City prepared and adopted a mitigated negative declaration (Case No. ENV-2016-1209-MND). Two appeals were filed and heard by the City. The appeal of Case No. CPC-2016-1208-CU-SPR was denied by the City Council on February 7, 2018; and the appeal of Case No. AA-2017-397-PMEX was denied by the City Planning Commission on November 19, 2018.

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[2] All square-footage numbers represent floor area as defined by the Los Angeles Municipal Code. Specifically, floor area includes the area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.

Subsequently, two petitions for writ of mandate were filed and consolidated challenging the City's approvals of the Project, on the grounds, among others, that the City's mitigated negative declaration was inadequate under CEQA (*Karney Management v. City of Los Angeles*, Case No. BS172677 [Consolidated with Case No. 18STCP03226]). The Honorable John A. Torribio of the Los Angeles County Superior Court ruled that the mitigated negative declaration was inadequate as to aesthetics, noise and traffic. On January 21, 2020, the court entered a judgment granting the petition for writ of mandate as to the CEQA cause of action, and denying the remainder of the causes of action. The judgment vacates the City's approval of the mitigated negative declaration and requires that an environmental impact report (EIR) be prepared for the Project. However, the judgment does not invalidate the underlying approvals (i.e., CPC-2016-1208-CU-SPR and AA-2017-397-PMEX) which remain valid.

This Initial Study is being prepared pursuant to the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677 (Consolidated with Case No. 18STCP03226). For purposes of this Initial Study, the Project is analyzed in the context existing prior to the adoption of any Project approvals or entitlements by the City. Thus, all impacts of the Project's discretionary approvals will be considered.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project site consists of property located at 12541 W. Beatrice Street, 12575 W. Beatrice Street, 12553-12575 W. Beatrice Street, and 5410-5454 S. Jandy Place within the Palms–Mar Vista–Del Rey Community Plan area of the City of Los Angeles. The Project site is located within a generally commercial office and industrial area and is bounded by office uses and surface parking immediately to the north, with State Route 90 (SR 90) located further north; office and surface and structure parking immediately to the east with Grosvenor Boulevard located further east; Beatrice Street to the south; and Jandy Place to the west. Across Beatrice Street to the south is a five-story apartment building; across Jandy Place to the west are converted warehouse structures used for office uses and surface parking. A vicinity map of the Project site and surrounding area is provided in Figure 1 on page 9, and an aerial view of the Project site and vicinity is included in Figure 2 on page 10.

3.2.2 Existing Conditions

The Project site is currently developed with a one-story (20-foot tall), 23,072-square-foot office building and two single-story accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and a two-story, (26-foot tall), 87,881-square-foot office building at 12541 W. Beatrice Street as well as surface parking. Vehicular and pedestrian access to the Project site is provided along W. Beatrice Street and along Jandy Place, with one driveway on Jandy Place and four driveways on W. Beatrice Street. The Project site contains limited to sparse landscaping in the form of non-native/non-protected trees,[3] hedges, and shrubs.

[3] The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.

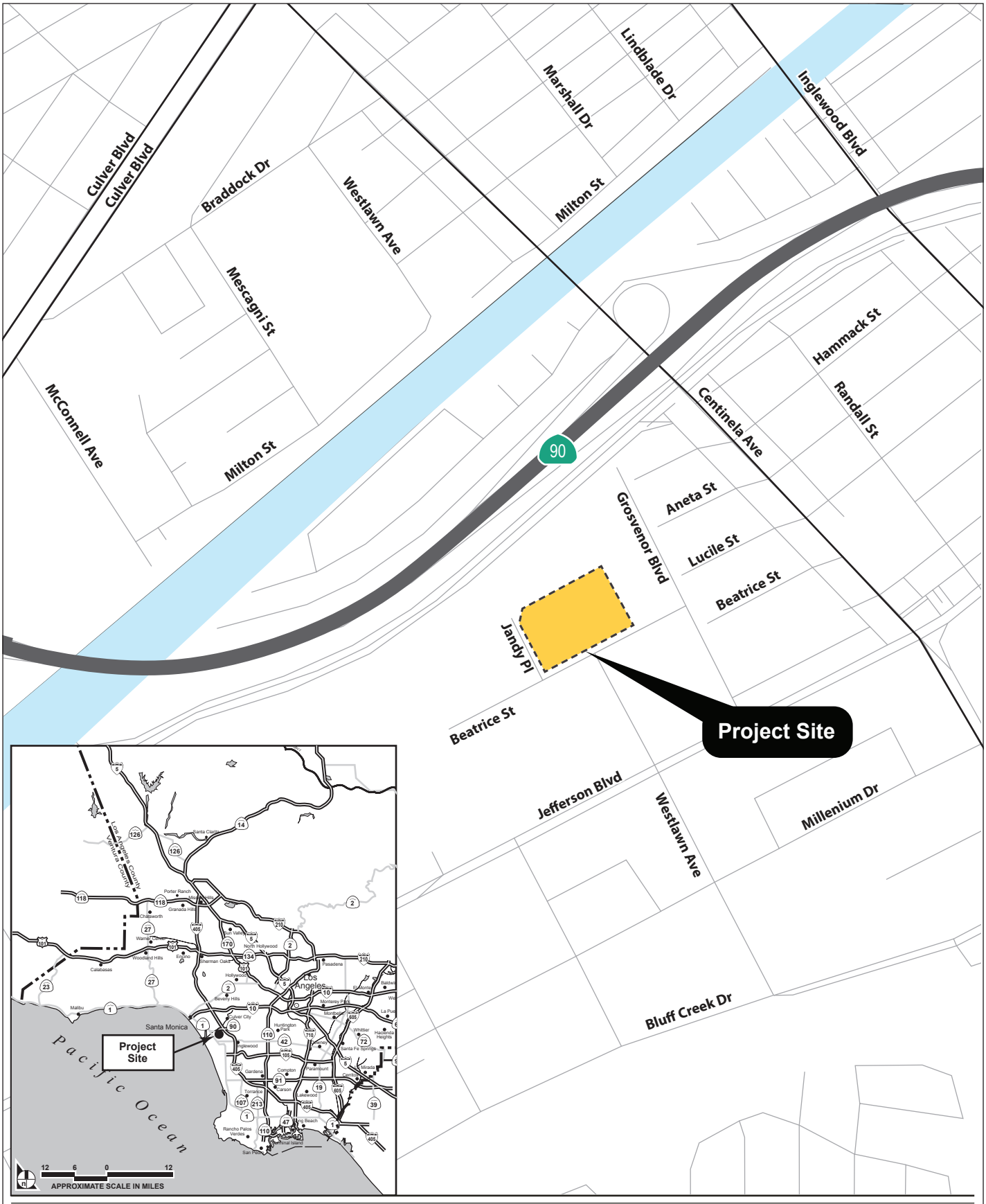


Figure 1
Project Location Map

Source: Eyestone Environmental, 2020.

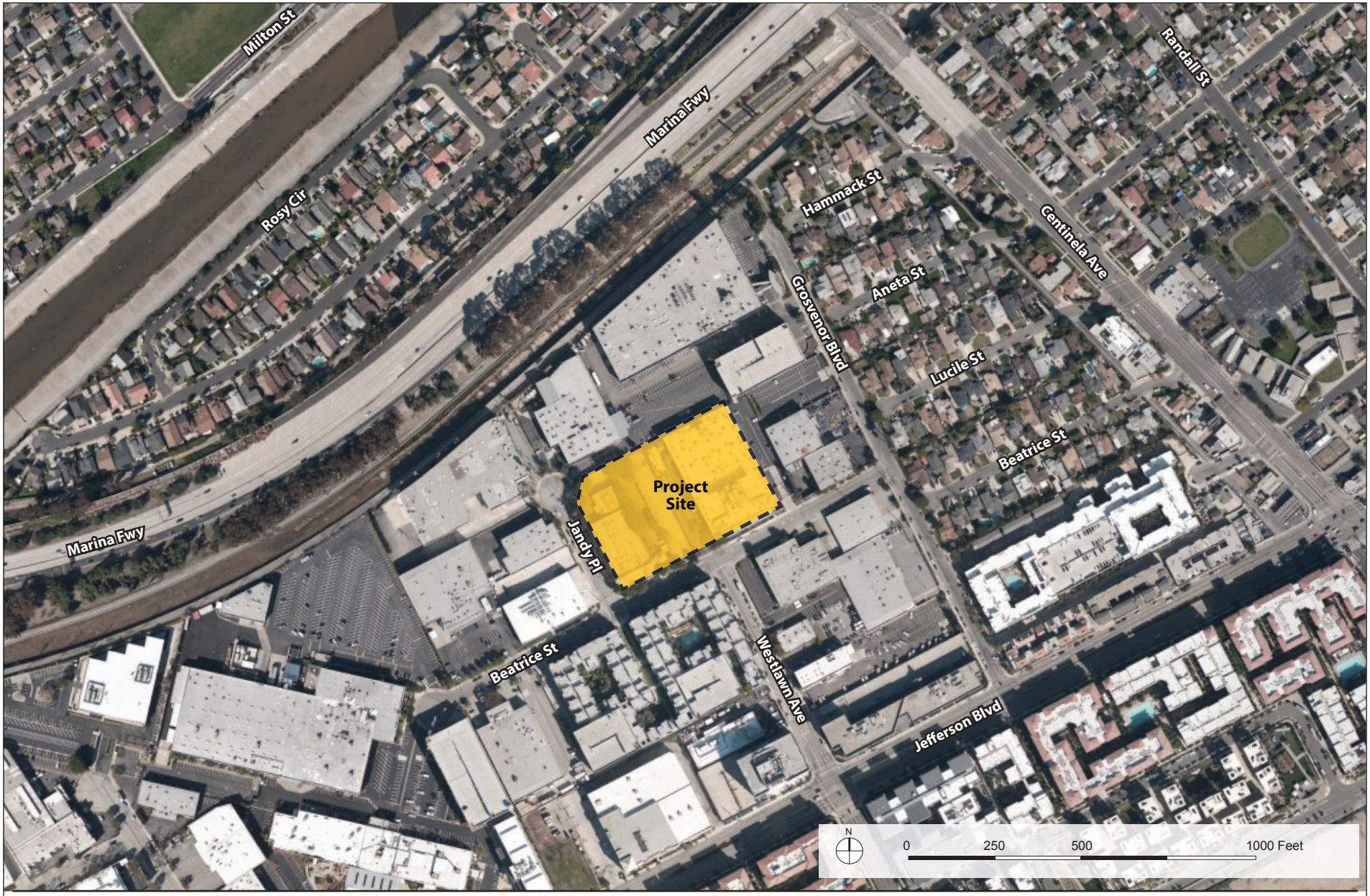


Figure 2

Aerial Photograph of the Project Vicinity

Source: Apple Maps, 2020; Eyestone Environmental, 2020.

The Project site is located within the Palms–Mar Vista–Del Rey Community Plan area of the City and has a Light Industrial land use designation. The Project site is zoned M2-1 (Light Industrial, Height District 1), which also permits M1 or MR2 uses; airport or aircraft landing field; automobile dismantling yard; cemetery; circus quarters; morgue; riding academy or stable; rifle range; curing, composting, and mulching facilities; and cargo container storage yard. Height District 1 within the M2 Zone has no height limit but restricts the maximum Floor Area Ratio (FAR) to 1.5 to 1.

3.2.3 Surrounding Land Uses

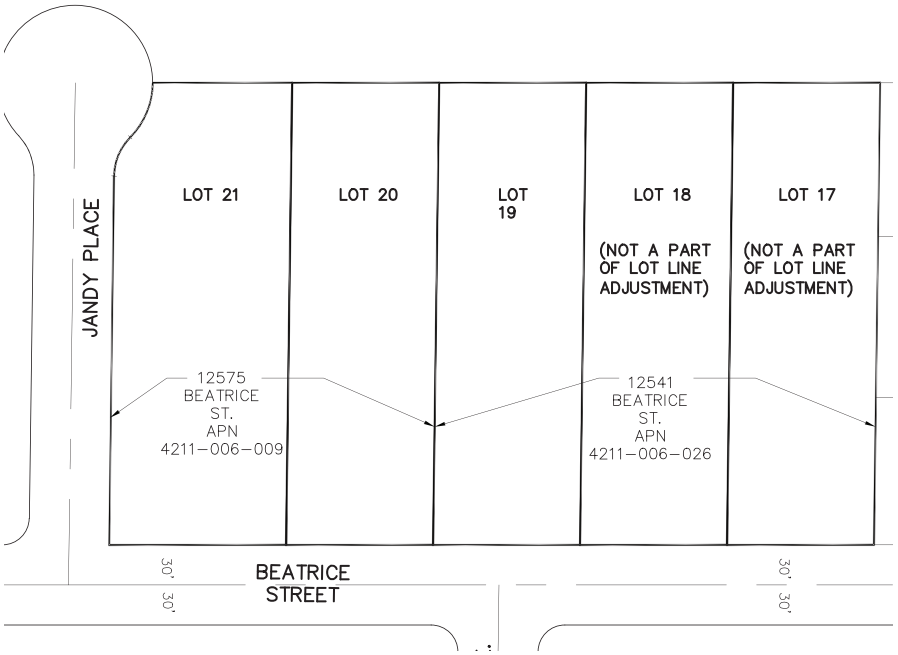
As previously noted, the Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The area surrounding the Project site includes a variety of land uses, including office, light industrial, and manufacturing uses interspersed with multi-family and single-family residential uses. Specifically, land uses surrounding the Project site include office uses immediately north, east, and west of the Project site with commercial and multi-family uses located south of the Project site (across Beatrice Street). Adjacent to the eastern side of the Project site are two-story commercial office/industrial buildings. Further east of the Project site, across Grosvenor Boulevard, are single-family residences filling the area from Hammock Street to W. Beatrice Street. A five-level parking structure is located adjacent to the Project site's northeastern side. The Centinela Creek Channel and State Route 90 are also located further north of the Project site.

3.3 DESCRIPTION OF PROJECT

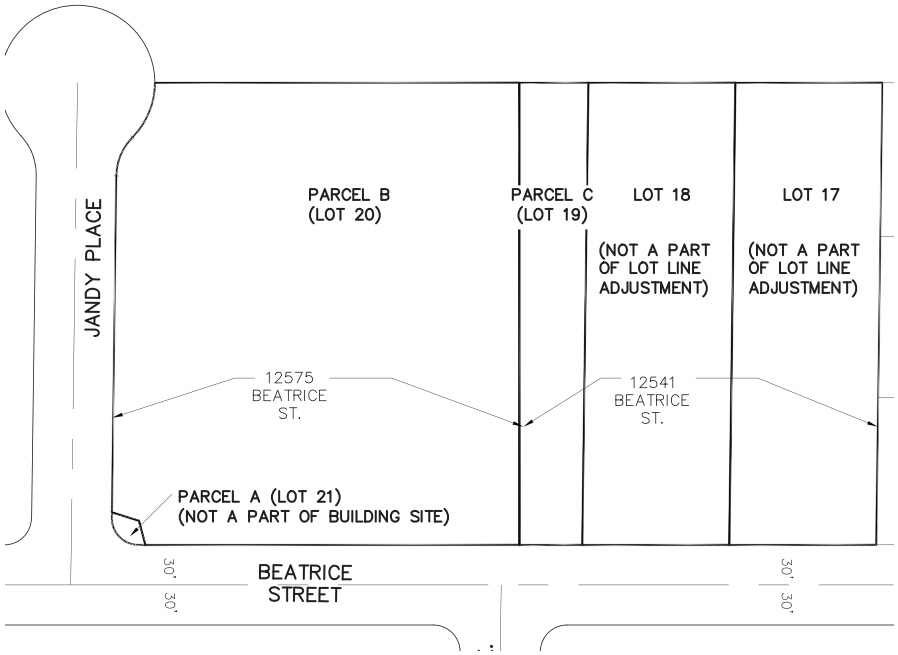
3.3.1 Project Overview

The Project includes the construction of a new eight-story office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The height of the proposed building would be approximately 135 feet to the top of the roof and 155 feet to the top of the elevator tower. A mechanical penthouse component could extend approximately 20 feet above the roof or parapet height. As part of the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained. As part of the Project, the existing property lot lines would be adjusted to accommodate a corner landscaped parcel, a building site for the construction of the proposed new building (at 12575 W. Beatrice Street, 12553–12575 W. Beatrice Street, and 5410–5454 S. Jandy Place), and a parcel for the existing building (at 12541 W. Beatrice Street). When the lot line adjustment is complete, the lot at 12575 W. Beatrice Street would contain approximately 103,281 square feet (2.37 acres) and the lot at 12541 W. Beatrice Street would contain approximately 93,182 square feet (2.14 acres). An approximately 389-square-foot lot would also be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes. The existing and proposed Project site lot lines are illustrated in Figure 3 on page 12. In addition, a conceptual site plan of the Project is illustrated in Figure 4 on page 13 and elevations of the proposed building are shown in Figure 5 on page 14 and in Figure 6 on page 15.

The Project would provide 811 parking spaces, fulfilling the requirements of the Los Angeles Municipal Code (LAMC). The majority of the parking spaces (791 spaces) would be provided in a five-level parking structure, including three levels above grade and two subterranean levels, with the remaining spaces (20 spaces) provided in a surface parking area.



Existing Project Site Lot Lines



Proposed Project Site Lot Lines

Figure 3

Existing and Proposed Project Site Lot Lines

Source: Eyestone Environmental, 2020.

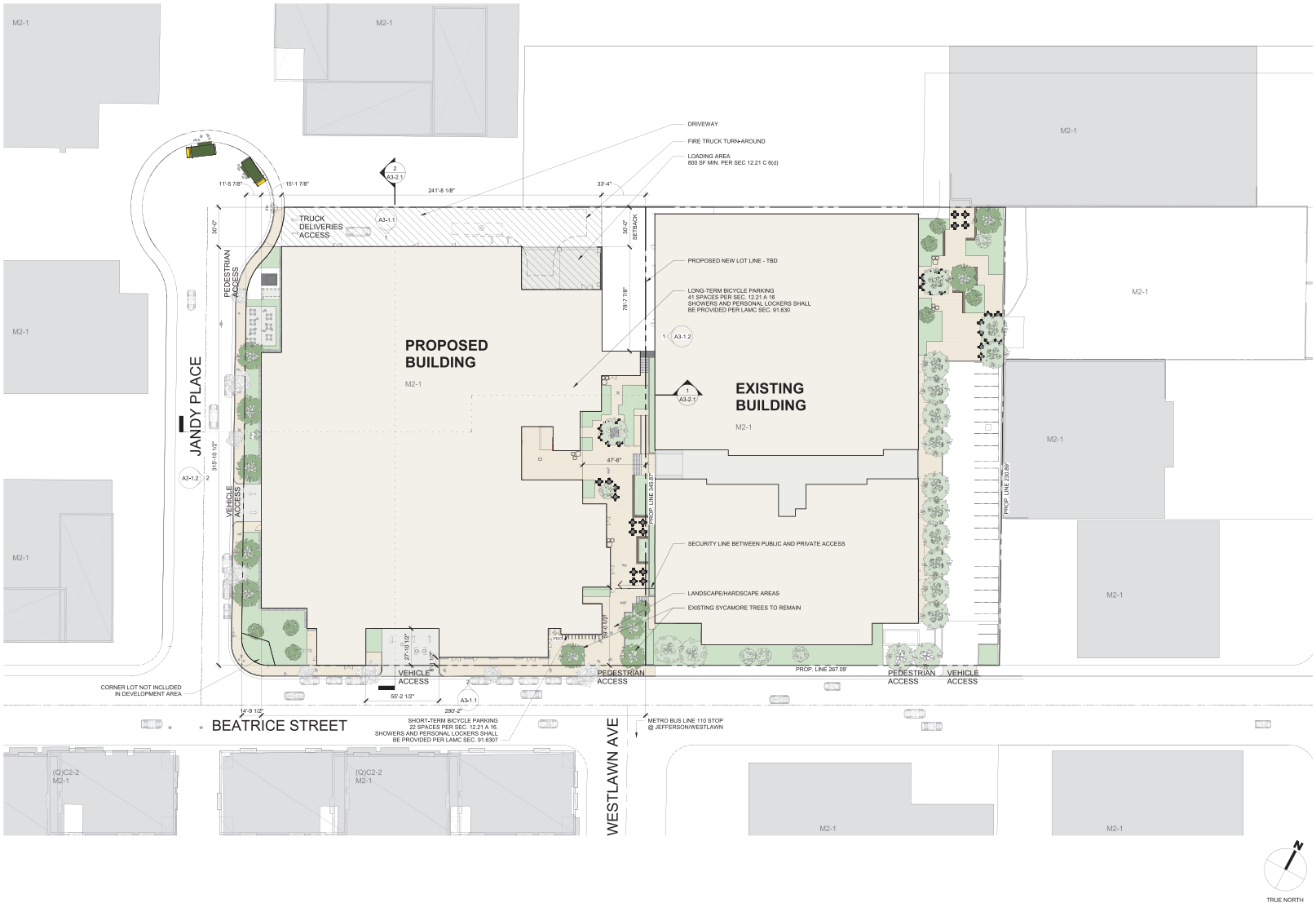
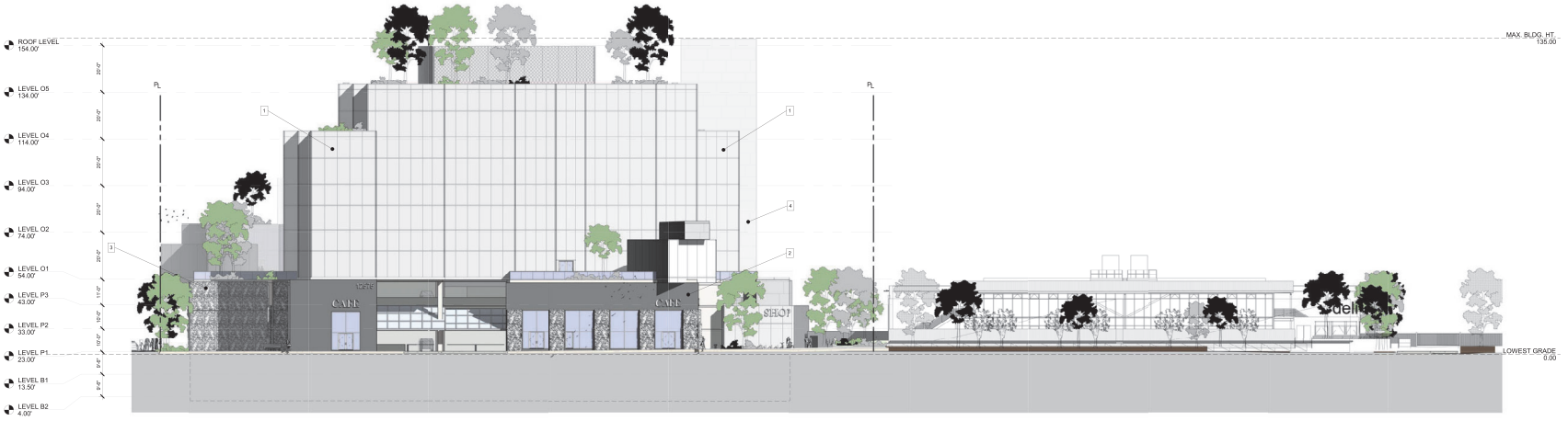


Figure 4
Conceptual Site Plan

Source: Eyestone Environmental, 2020.



South Building Elevation - Beatrice St.

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL

North Building Elevation

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL

Figure 5

Conceptual Elevations – North and South

Source: Eyestone Environmental, 2020.

West Building Elevation - Jandy Place

East Building Elevation - Pedestrian Walk

Figure 6

Conceptual Elevations – East and West

Source: Eyestone Environmental, 2020.

The Project would include landscaped courtyards and walkways to connect and integrate the proposed building with the office building to remain, to create an integrated creative office campus. The Project would provide approximately 38,033 square feet of landscaping throughout the Project site.

In recognition of the nearby single-family neighborhood to the east across Grovesnor Avenue, the Project's tallest elements are oriented away from the residential area. The Project steps down in size and scale modulating in height from the existing 25-foot office building on the eastern portion of the Project site, to the new construction up to 135 feet on the western portion of the Project site. The Project is accented by outdoor areas and extensive landscaping. Street level landscaping, pedestrian amenities, walkways, and retail uses would be added to activate the area. Above grade parking would be screened and integrated into the new building's architecture. Specifically, as illustrated in the conceptual elevations included in Figure 5 on page 14 and in Figure 6 on page 15, the majority of the proposed parking would not be visible as it would be wrapped by the proposed commercial uses on the ground floor and would be screened using architectural screening elements and landscaping. The creative office campus would involve the new construction of a structure that has been designed with floor plates and ceiling heights varying in size by level, which may be modified to offer flexible combinations of spaces to accommodate different user needs.

3.3.2 Open Space and Landscaping

The Project would provide approximately 38,033 square feet of landscaped area (e.g., trees, green space, etc.) and 54,583 square feet of hardscape area (e.g., courtyards, pathways, etc.) throughout the Project site and on the building terraces on the upper levels of the proposed building. As summarized in Table 1 on page 17, each of the Project's upper levels provide landscaped terrace areas that are accessible to future Project tenants. The eighth level provides a large terrace with seating and landscaped areas that is accessible to all future Project tenants.

In addition to the landscaped terraces described above, the Project provides an internal landscaped pedestrian courtyard at the ground level, varying between 32 feet to 48 feet wide, between the proposed building at 12575 W. Beatrice Street and the existing commercial building at 12541 W. Beatrice Street, lined with seating areas, trees, and landscaped area providing outdoor open space areas for tenants of both buildings. New hardscape and landscaped areas would also be added to the northeastern portion of 12541 W. Beatrice Street in a new courtyard area with seating, and new trees would be planted along Beatrice Street at the perimeter of the 12541 W. Beatrice Street building, creating a separation between the building and the existing surface parking lot. New street trees along Jandy Place would be planted as part of the Project, and a new landscaped seating area would be provided along Jandy Place, which is proposed to provide streetscape improvements, including pedestrian seating.

There are approximately 61 trees on the Project site, including 51 Tipuana (*Tipuana tipu*) trees, 8 Ficus species (*benjamina*, *retusa* and *rubiginosa*), and 2 California sycamore (*Platanus racemosa*) trees, which are considered a protected species under City of Los Angeles ordinance.[4] The two existing California Sycamore trees would remain on the Project site. In addition, the Project would replace the 59 non-protected trees to be removed throughout the Project site at a rate of at least 1:1. There are no existing street trees around the Project site perimeter.

[4] Arbor Essence. Tree Survey, September 15, 2020. Refer to Appendix IS-1 of this Initial Study.

Table 1
Summary of Proposed Landscaped Areas

Location	Size
Building Level 1, including perimeter and internal courtyard	17,069 sf
Building Level 2	0 sf
Building Level 3	0 sf
Building Level 4 terrace/patio	3,312 sf
Building Level 5 terrace/patio	2,358 sf
Building Level 6 terrace/patio	1,029 sf
Building Level 7 terrace/patio	2,994 sf
Building Level 8 terrace/patio	11,271 sf
Total	**38,033 sf**

sf = square feet

Source: Chait and Associates, 2020.

3.3.3 Access, Circulation, and Parking

Vehicular access to the Project site would continue to be provided from Beatrice Street and Jandy Place. On Jandy Place, the Project would include one driveway to access the parking garage with one lane in each direction, in addition to a driveway dedicated to truck deliveries, which is located on the northwestern corner of the Project site. These two driveways would replace the one existing driveway along Jandy Place. On W. Beatrice Street, the Project would provide one driveway to access the parking garage with two lanes entering and one lane exiting the garage, in addition to the existing driveway on Beatrice Street that currently serves the building at 12541 W. Beatrice Street. Pedestrian access to the Project site would be from Beatrice Street, Jandy Place, and from the internal courtyard at the ground level between the proposed building at 12575 W. Beatrice Street and the existing commercial building at 12541 W. Beatrice Street.

Per LAMC Section 12.21.A.4(c), the Project would be required to provide 586 parking spaces.[5] The Project would provide a total of 811 parking spaces, exceeding the requirements of the LAMC. Of the 811 parking spaces, 791 spaces would be provided in a five-level parking structure, including two levels of subterranean parking and three above ground parking levels. Excavation for the subterranean parking levels would extend to a depth of approximately 22 feet, with the finished floor at a depth of approximately 19 feet. The remaining 20 parking spaces would be provided in a surface parking area on the east side of the 12541 W. Beatrice Street office building to remain. The proposed parking would serve both the newly constructed office building as well as the existing office building to remain. Additionally, the Project would include 22 short-term and 41 long-term bicycle parking spaces along with showers and locker rooms, in compliance with Section 91.6307 of the LAMC (Ordinance No. 185480). The Project would also include 244 parking spaces capable of supporting future electric vehicle EV supply equipment, and 82 parking

[5] Pursuant to LAMC Sections 12.21.A.4(c), (j)(3) and (k) both the office and retail components of the Project require one space for each 500 square feet of floor area; café uses are provided one space per 100 square feet of floor area.

spaces with EV chargers, which would include a label stating "EV CAPABLE" posted in a noticeable place at the service panel or subpanel and next to the raceway termination point (Ordinance No. 186485).

3.3.4 Lighting and Signage

The Project would include low-level exterior lights adjacent to the proposed building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project site. All lighting would comply with current energy standards and codes, as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project site onto adjacent properties, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project site and would comply with the LAMC. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. No off-premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. New signage would be architecturally integrated into the design of the proposed building and would establish appropriate identification for the proposed uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

3.3.5 Sustainability Features

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including but not limited to: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; and water-efficient landscaping. The Project would comply with Los Angeles Green Building Code Section 95.05.211 to the satisfaction of the Department of Building and Safety, and as a result would provide at minimum 3,300 square feet of roof area reserved for a solar photovoltaic system. Electric vehicle (EV) wiring would be installed prior to occupancy of the building. As previously mentioned, the Project would provide parking spaces equipped with EV charging stations and/or outlets for plugin.

3.3.6 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing on-site structures. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over an approximate 18-month period and be completed in 2024. It is estimated that approximately 59,000 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

As described above, the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677 (Consolidated with Case No. 18STCP03226), did not set aside the underlying Site Plan Review, Conditional Use Permit and Lot Line Adjustment approvals (i.e., CPC-2016-1208-CU-SPR and AA-2017-397-PMEX-1A). However, this EIR considers the context of the Project as the context existing prior to all Project approvals.

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

- Pursuant to LAMC Section 16.05, Site Plan Review to authorize the Project's new buildings and uses;
- Pursuant to LAMC Section 12.24.U.14, a Conditional Use Permit (CUP) for "Major" development projects;
- Pursuant to LAMC Section 17.50B3c, a Parcel Map Exemption—Lot Line Adjustment;
- A haul route, if required, by the Los Angeles Department of Building and Safety; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

As discussed in Section 3, Project Description, of this Initial Study, the Project was previously considered and approved by the City under Case Nos. CPC-2016-1208-CU-SPR and AA-2017-397-PMEX-1A. To comply with CEQA, the City prepared and adopted a mitigated negative declaration (MND) (Case No. ENV-2016-1209-MND). Two appeals were filed and heard by the City. The appeals were denied by the City. Subsequently, two petitions for writ of mandate were filed and consolidated challenging the City's approvals of the Project, on the grounds, among others, that the City's mitigated negative declaration was inadequate under CEQA (*Karney Management v. City of Los Angeles*, Case No. BS172677 [Consolidated with Case No. 18STCP03226]). On January 21, 2020, the court entered a judgment granting the petition for writ of mandate as to the CEQA cause of action, and denying the remainder of the causes of action. The judgment vacates the City's approval of the MND and requires that an environmental impact report (EIR) be prepared for the Project. However, the judgment does not invalidate the underlying approvals (i.e., CPC-2016-1208-CU-SPR and AA-2017-397-PMEX-1A) which remain valid. Accordingly, this Initial Study is being prepared pursuant to the judgment in *Karney Management v. City of Los Angeles*.

This Initial Study considers the Project in relation to the 2019 updated Appendix G of the State CEQA Guidelines as the thresholds of significance, and will incorporate mitigation measures as necessary.

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

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

Potentially Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As discussed in Section 3, Project Description, of this Initial Study, the Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The area surrounding the Project site includes a variety of land uses, including office, light industrial, and manufacturing uses interspersed with multi-family and single-family residential uses. Specifically, land uses surrounding the Project site include office uses immediately north, east, and west of the Project site with commercial and multi-family uses located south of the Project site (across Beatrice Street). Adjacent to the eastern side of the Project site are two-story commercial office/industrial buildings. Further east of the Project site, across Grosvenor Boulevard, are single-family residences filling the area from Hammock Street to Beatrice Street. A five-level parking structure is located adjacent to the Project site's northeastern side. The Centinela Creek Channel and State Route 90 are also located further north of the Project site. Due to the highly urbanized and built out surroundings, it does not appear that publicly available scenic vistas of any valued visual resources are available adjacent to the Project site. However, the EIR will include further evaluation of the surrounding uses and the presence of visual resources in the vicinity of the Project Site.

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

No Impact. The Project site is not located along a state scenic highway. The nearest officially eligible (not yet designated) state scenic highway is along California State Route 1 (SR-1), specifically starting at Route 187 near Santa Monica, which is located approximately 2.3 miles northwest of the Project site and extends up to Route 101 near El Rio.[6] In addition, as discussed below in Checklist Section IV (Biological Resources) and Checklist Section V (Cultural Resources), the Project would not significantly impact trees or historic buildings. Therefore, as the Project site is not located along a state scenic highway, the Project would not substantially damage scenic resources within a state scenic highway. No impacts would occur, and no further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project site is located within the Palms–Mar Vista–Del Rey Community Plan area of the City of Los Angeles in an urbanized area characterized by a mixture of office, light industrial, and manufacturing uses interspersed with multi-family and single-family residential uses. Due to the urbanized and built out

6 Caltrans, Scenic Highways, *List of eligible and officially designated State Scenic Highways (XLSX)*, accessed March 12, 2020.

surroundings as well as the types of uses within and surrounding the Project site, neither the Project site nor its surroundings reflect an area of special scenic quality. Notwithstanding, the EIR for the Project will include further evaluation of the Project's consistency with applicable zoning and other regulations governing scenic quality, including the City's General Plan Framework Element Urban Form and Neighborhood Design Chapter and the Citywide Design Guidelines.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project includes the construction of a new eight-story office building with a total floor area of 199,500 square feet. As part of the Project, the existing structures at 12575 W. Beatrice Street with a combined floor area of 7,188 square feet would be removed while the existing office building at 12541 W. Beatrice Street would be retained. As the Project would increase the building area within the Project Site, there will be additional sources of light and glare compared to existing conditions. Therefore, the EIR will provide further analysis of the Project's potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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?	☐	☐	☐	☒
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))?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project site is currently developed with office uses and surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project site. Further, the Project site and surrounding area[7] are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[8] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project site is zoned as M2-1 (Light Industrial, Height District 1), which permits a variety of light industrial uses. The Project site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project site and surrounding area are also not enrolled under a Williamson Act Contract.[9] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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7 Immediately surrounding area APNs include: 4211006002, 4211006003, 4211006004, 4211006005, 4211006006, 4211006010, 4211005013, 4211005016, 4211005021, and 4211006025.

8 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026 http://zimas.lacity.org/, accessed March 3, 2020.

9 California Department of Conservation, The Williamson Act Status Report 2016-17, www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed March 3, 2020.

No Impact. As previously discussed, the Project site is located in an urbanized area and is currently developed with office uses and surface parking. The Project site does not include any forest land or timberland. In addition, the Project site is currently zoned for light industrial uses and is not zoned for forest land and is not used as forest land.[10] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

No Impact. As discussed above, the Project site is located in an urbanized area of the City of Los Angeles and does not include farmland or forest land. Further, the Project site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[11] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐

[10] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026, http://zimas.lacity.org/, accessed March 3, 2020.

[11] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026, http://zimas.lacity.org/, accessed March 3, 2020.

Immediately surrounding area APNs: 4211006002, 4211006003, 4211006004, 4211006005, 4211006006, 4211006010, 4211005013, 4211005016, 4211005021, and 4211006025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[12]).[13] SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[14] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.[15] Construction and operation of the Project, which would include the demolition of 30,260 square feet of office and accessory uses and the development of 199,500 square feet of new retail and office uses, would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with SCAQMD's AQMP.

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12 Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

13 USEPA, Current Nonattainment Counties for All Criteria Pollutants, Los Angeles County, www3.epa.gov/airquality/greenbook/ancl.html, accessed April 22, 2020.

14 SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

15 The Regional Council of Southern California Association of Governments (SCAG) formally adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) September 2020. However, the 2020–2045 RTP/SCS has not been formally adopted by the California Air Resources Board. As such, SCAG's 2016–2040 RTP/SCS is also considered in the discussion of population and housing provided below.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

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

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

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

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project proposes additional office uses with accessory ground floor retail uses within an existing commercial office development, and would not involve the operation of uses typically associated with odor complaints. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[16] These rules are designed to limit or control emissions from specific types of equipment and/or processes that may have an adverse effect on humans. In particular, Rule 401 provides that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour.[17] Rule 402 provides that a person shall not discharge from any source whatsoever such

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[16] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 4, 2020.

[17] SCAQMD, Rule 401, Visable Emissions, adopted February 4, 1977.

quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[18] In addition, the purpose of Rule 403 is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.[19]

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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 Wildlife or U.S. 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?	☐	☐	☒	☐

[18] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

[19] SCAQMD, Rule 403, Fugitive Dust, adopted May 7, 1976.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project site is located in an urbanized area and is currently developed with office uses and surface parking. Landscaping within the Project site is limited to common ornamental trees, grasses, and shrubs. The Centinela Creek Channel, which is classified by the U.S. Fish and Wildlife Service as a Riverine System,[20] is located approximately 300 feet north of the Project site and, construction of the Project would not result in its removal, filling, or other means of hydrological interruption. Specifically, construction activities would occur within the boundaries of the Project site and would be separated by an existing intervening property with a building and parking lot. Overall, due to the urbanized and disturbed nature of the Project site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[21] or by the U.S. Fish and Wildlife Service (USFWS)[22] would be present on-site. Furthermore, the Project site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[23] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project 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?

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20 According to the U.S. Fish and Wildlife Service Wetlands Mapper, the Riverine System includes all wetlands and deepwater habitats contained within a channel, www.fws.gov/wetlands/data/Mapper.html, accessed April 27, 2020.

21 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

22 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/species-listed-by-state-totals-report, accessed June 10, 2020.

23 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-6.

No Impact. The Project site is located in an urbanized area and is currently developed with office uses and surface parking. No riparian or other sensitive natural community exists on the Project site.[24] The Centinela Creek Channel, which is classified by the U.S. Fish and Wildlife Service as a Riverine System,[25] is located approximately 300 feet north of the Project site. Construction activities would occur within the boundaries of the Project Site and would be separated from the Centinela Creek Channel by an existing intervening property with a building and parking lot. Furthermore, the Project site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[26,27] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[28,29,30] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project site is located in an urbanized area and is currently developed with office uses and surface parking. No water bodies or state and federally protected wetlands exist on the Project site.[31] The Centinela Creek Channel, which is classified by the U.S. Fish and Wildlife Service as a Riverine System,[32] is located approximately 300 feet north of the Project site and, construction of the Project would not result in its removal, filling, or other means of hydrological interruption. Specifically, construction activities would occur within the boundaries of the Project Site and would be separated by an existing intervening building. As discussed further below in Checklist Section X, Hydrology and Water Quality, of this Initial Study, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan that would set forth Best Management Practices (BMPs) to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In

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24 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 11, 2020.

25 According to the U.S. Fish and Wildlife Service Wetlands Mapper, the Riverine System includes all wetlands and deepwater habitats contained within a channel, www.fws.gov/wetlands/data/Mapper.html, accessed April 27, 2020.

26 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-6.

27 Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

28 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://wildlife.ca.gov/Data/BIOS, accessed April 4, 2020.

29 California Department of Fish and Wildlife, CDFW Lands, https://wildlife.ca.gov/Lands/Viewer, accessed April 4, 2020.

30 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 11, 2020.

31 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 11, 2020.

32 According to the U.S. Fish and Wildlife Service Wetlands Mapper, the Riverine System includes all wetlands and deepwater habitats contained within a channel, www.fws.gov/wetlands/data/Mapper.html, accessed April 27, 2020.

addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Furthermore, during operation, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. As such, the Project would not have an adverse effect on state or federally protected wetlands. Impacts would be less than significant, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As described above, the Project site is located in an urbanized area and is currently developed with office uses and surface parking. In addition, the areas surrounding the Project site are fully developed and there are no large expanses of open space areas within and surrounding the Project site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[33,34]

According to the Tree Survey prepared for the Project by Arbor Essence, dated September 15, 2020, and included in Appendix IS-1 of this Initial Study, a total of 61 trees are located within the Project site. There are no street trees located within the public right-of-way adjacent to the Project site. The Project would involve the removal of 59 of the 61 trees located on the Project Site. Trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 (Section 3503) states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the code and the CDFW has not promulgated regulations interpreting these provisions. To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would require that tree removal activities would take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife

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33 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-6.

34 Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in cumulative diameter, four and one half feet above the ground level at the base of the tree. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree [...]" and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Survey included in Appendix IS-1 of this Initial Study, a total of 61 trees are located within the Project site, including 51 Tipuana (Tipuana tipu) trees, 8 Ficus (*benjamina, retusa* and *macropylla*) trees, and two California sycamore (*Platanus racemose*) trees. All 61 trees on the Project site have a trunk diameter of eight inches or greater. In addition, as discussed above, the City's Protected Tree Ordinance identifies sycamore trees as a protected tree species. The Project would involve the removal of the 51 Tipuana (Tipuana tipu) trees and 8 Ficus (*benjamina, retusa* and *macropylla*) trees. As shown above in the conceptual site plan for the Project provided in Figure 4 on page 13, the two California sycamore trees identified along the southern perimeter of the Project site would be retained as part of the Project. In addition, no grading or excavation would impact these trees as no improvements or structures are located beneath or in the area of the trees. Specifically, as illustrated in Figure 4, the two California sycamore trees would be retained in their current locations and incorporated into the internal landscaped pedestrian courtyard proposed at the ground level between the proposed building at 12575 W. Beatrice Street and the existing commercial building at 12541 W. Beatrice Street that would remain. This proposed landscaped pedestrian courtyard would be lined with seating areas, trees, and landscaped area providing outdoor open space areas for tenants of both buildings. Additionally, in accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. There are no street trees located within the public right-of-way adjacent to the Project site. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project site is located in an urbanized area and is currently developed with office uses and surface parking. As also previously discussed, landscaping within the Project site is limited, consisting of ornamental trees and shrubs and the Project site does not support any

habitat or natural community.[35] No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project site.[36] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?	☐	☐	☒	☐
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 dedicated cemeteries?	☐	☐	☒	☐

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

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

[35] United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 11, 2020.

[36] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

As discussed in Section 3, Project Description, of this Initial Study, the Project site is currently developed with a 23,072-square-foot office building and two accessory buildings comprised of 5,044 and 2,144 square feet at 12575 West Beatrice Street, and an 87,881-square-foot office building at 12541 West Beatrice Street as well as surface parking. As part of the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained. According to the parcel profile report included in the City's Zone Information and Map Access System (ZIMAS), the structures proposed to be removed at 12575 W. Beatrice Street were built in 1969.[37] Given the age (1970s through 1990s) and unremarkable design of the existing structures, which are not considered to reflect a particular historical or architectural style, the on-site structures are not considered historic resources. In addition, based on a review of the SurveyLA Historic Resources Survey Report for the Palms–Mar Vista–Del Rey community, the HistoricPlacesLA database,[38] and the Los Angeles ZIMAS database, the Project site, including the existing structures within the Project site, has not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register; nor has any of the adjacent sites. The Project site has also not been designated as a Historic-Cultural Monument and is not located within an existing Historic Preservation Overlay Zone; nor has any of the adjacent sites. Therefore, there are no historic resources within and adjacent to the Project site.[39] Furthermore, a records search was conducted for the Project area by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project site (see Appendix IS-2 of this Initial Study). The records search includes a review of all recorded archeological sites within a 0.5-mile radius of the Project site as well as a review of cultural resource reports on file.[40] The California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Historic Resources Inventory, and City of Los Angeles Historic-Cultural Monuments listings were also reviewed for the Project site. The records search indicates that there are no historic resources located on-site or on adjacent sites. Therefore, as no identified historic resources are located on-site or on adjacent sites, impacts to historic resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require grading and excavation for the construction

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37 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed April 2, 2020.

38 City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed April 2, 2020.

39 City of Los Angeles Department of City Planning, SurveyLA, Los Angeles Historic Resources Survey Report for the Palms–Mar Vista–Del Rey Community Plan Area, July 2012, https://planning.lacity.org/preservation-design/survey-la-results-palms-mar-vista-del-rey, accessed April 2, 2020.

40 The Project's potential impacts on archaeological resources are addressed below in threshold question (b).

of the proposed subterranean parking garage, which would extend to a depth of approximately 22 feet below ground surface. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

Less Than Significant Impact. As discussed above, the Project site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project site is low. Nevertheless, the Project would require grading, excavation for two subterranean parking levels at a depth of 22 feet below ground surface, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed above, the Project site is currently developed with office uses and surface parking. The Project would involve removal of the existing 23,072-square-foot office building and two accessory buildings comprised of 5,044 and 2,144 square feet at 12575 West Beatrice Street, and would retain the existing 87,881-square-foot office building at 12541 West Beatrice Street (located to east of the proposed building). The Project would include the construction of an approximately 199,500-square-foot building consisting of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. Due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. In addition, the Project would generate an increased demand on transportation energy. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standard required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[41] The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[42] The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2017 national standards.[43]

As previously described, the Project site is developed with office uses and surface parking. In addition to the retention and incorporation of the existing 87,881-square-foot office building at 12541 West Beatrice Street, the Project would include the construction of a 199,500-square-foot building consisting of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. The Project site

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41 CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/rps/, accessed March 4, 2020.

42 CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/, accessed March 4, 2020.

43 CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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 defined 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?	☒	☐	☐	☐

The following analysis is based on the Geotechnical Engineering Investigation prepared for the Project by Geotechnologies, Inc., dated March 19, 2018 and revised March 19, 2020. All specific information on

geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

a. Would the project 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. Surface fault rupture occurs when movement on a fault breaks through to the earth's surface.[44] Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years. Potentially active faults have demonstrated displacement within the last 1.6 million years. Inactive faults do no exhibit displacement younger than 1.6 million years before the present. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones. These zones extend from 200 feet to 500 feet on each side of the known fault and identify areas where a potential surface rupture could provide hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures and are required to be set back a certain distance from the Alquist-Priolo Earthquake Fault Zone.

Based on a review of regulatory maps prepared by the California Department of Conservation and the City of Los Angeles General Plan Safety Element, the Project site is not located within an Alquist-Priolo Special Studies Zone or Fault Rupture Study Area.[45,46] In addition, according to the Geotechnical Engineering Investigation, included in Appendix IS-3, of this Initial Study, based on research of available literature as well as results of site reconnaissance, no known active faults or potentially active faults with the potential for surface rupture underlie the Project site. Therefore, as concluded in the Geotechnical Engineering Investigation, the potential for surface ground rupture at the Project site is considered low. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[44] California Department of Conservation, Alquist-Priolo Earthquake Fault Zones, www.conservation.ca.gov/cgs/alquist-priolo, accessed March 6, 2020.

[45] California Department of Conservation, Information Warehouse Regulatory Maps, https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/, accessed March 6, 2020.

[46] Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit A—Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/City%20of%20Los%20Angeles,%20Safety%20Element%20of%20the%20General%20Plan.pdf, accessed March 6, 2020.

ii. Strong seismic ground?

Less Than Significant Impact. The Project site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project site and the Project site is not located in an Alquist-Priolo Earthquake Fault Zone. According to ZIMAS, the closest active fault is the Newport-Inglewood Fault located approximately 3.1 miles from the Project site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a required final geotechnical report for the Project, as set forth in LAMC Section 91.7006.2, which will be subject to review and approval by the Los Angeles Department of Building and Safety as part of the standard development review plan check process.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project's impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated, granular soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Seismic Hazard Zones Map for the Venice Quadrangle, the Project site is located within a liquefaction hazard zone.[47] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The Safety Element of the Los Angeles City General Plan also indicates the Project site is located within a liquefiable area (recent alluvial deposits; ground water less than 30 feet deep).[48] Thus, the Geotechnical Engineering Investigation conducted a liquefaction analysis. As detailed in the Geotechnical Engineering Investigation, the analysis indicates that the underlying soils would be liquefiable under the maximum considered earthquake (6.7) ground motion.

As discussed above, liquefaction can result in settlement and lateral spreading. According to the Geotechnical Engineering Investigation, due to the loose nature of the underlying soil and the relatively high groundwater, the soils can behave like a liquid during a major seismic event. As a result, between 1.09 to 3.77 inches of seismic induced settlement could occur. However, this would be mitigated by the building foundation system (piles), which will be drilled to penetrate through the liquefiable layers and deepened into the Older Alluvium below the site. As discussed in the Geotechnical Engineering Investigation, the relative thickness of liquefiable soils to overlying non-liquefiable surface material on the Project site fall well outside the bounds within which the surface effects of liquefaction have been observed during past earthquakes. Therefore, as concluded in the Geotechnical Engineering Investigation, the likelihood that surface effects of liquefaction would occur on the Project site would be considered very low to non-existent. Accordingly, the Geotechnical Engineering Investigation determined that should liquefaction occur within the potentially liquefiable zones on the Project site, there would be a negligible effect on the proposed structures. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS for a site located within a potentially liquefiable area as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation.

With regard to lateral spreading, as discussed in the Geotechnical Engineering Investigation, lateral spreading is the most pervasive type of liquefaction-induced ground failure. During lateral spread, blocks of mostly intact surficial soil displace downslope. As provided in the Geotechnical Engineering Investigation, when the saturated cohesionless sediments/soils have a normalized standard penetration resistance $(N_1)_{60}$ that is greater than 15, significant displacement is not likely under an earthquake with a magnitude 8 or less. As provided in the Geotechnical Engineering Investigation, the saturated cohesionless sediments underlying the Project site have corrected $(N_1)_{60}$ values greater than 15 under a magnitude 6.7 earthquake. Therefore, as concluded in the Geotechnical Engineering Investigation, the potential for lateral spreading as a result of liquefaction is considered remote on the Project site. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS for a site located within a potentially liquefiable area as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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47 California Department of Conservation, Information Warehouse Regulatory Maps, https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/, accessed March 6, 2020.

48 Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit B—Areas Susceptible to Liquefaction in the City of Los Angeles, https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/City%20of%20Los%20Angeles,%20Safety%20Element%20of%20the%20General%20Plan.pdf, accessed March 6, 2020

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soils and/or rocks on steep sloping terrain. The Project site and surrounding area are fully developed and characterized by flat topography. According to the California Department of Conservation's Seismic Hazard Zones Map for the Venice Quadrangle, the Project site is not located within an earthquake-induced landslide area.[49] Furthermore, the Los Angeles General Plan Safety Element does not map the Project site in a landslide area.[50] According to the Geotechnical Engineering Investigation, the probability of seismically-induced landslides occurring on the Project site is considered to be low due to the general lack of elevation difference in slope geometry across or adjacent to the Project site. Development of the Project also would not include altering the existing topography of the Project site such that new steep slopes would be introduced. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project site is currently fully developed with buildings and surface parking areas. As such, there are no extensive open spaces with exposed topsoil. However, construction of the Project would require grading, excavation, and other construction activities that have the potential to disturb soils underneath the Project site and expose these soils to rainfall and wind, which can result in soil erosion. However, this potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. Regarding soil erosion during Project operations, the potential is negligible since the Project site would mostly remain fully developed, except for some landscaping located throughout the Project site. However, the landscaping would include trees to prevent soil erosion. The Project would also be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project site is not located in a landslide area as mapped by the state, nor is the Project site mapped as a landslide area by the City. Upon buildout of the Project, the existing topography of the Project site would not be substantially altered. Specifically, the

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[49] California Department of Conservation, Division of Mines and Geology, Seismic Hazards Zones Map, Venice 7.5 Minute Quadrangle map, March 25, 1999.

[50] Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

Project site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

As previously discussed, liquefaction-related effects include lateral spreading. Although the Project site is located in an identified liquefiable area, the potential for lateral spreading is considered remote. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS for a site located within a potentially liquefiable area, as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project site. Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project site. Thus, the Project's impact related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, the Project site is located within an area susceptible to liquefaction. However, as detailed in the Geotechnical Engineering Investigation, the relative thickness of liquefiable soils to overlying non-liquefiable surface material on the Project site fall well outside the bounds within which the surface effects of liquefaction have been observed during past earthquakes. Therefore, as concluded in the Geotechnical Engineering Investigation, the likelihood that surface effects of liquefaction would occur on the Project site would be considered very low to non-existent. Accordingly, the Geotechnical Engineering Investigation determined that should liquefaction occur within the potentially liquefiable zones on the Project site, there would be a negligible effect on the proposed structures. As such, the Project's impact related to liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.[51] According to the Geotechnical Engineering Investigation, the soils underlying the Project site consist of medium firm to stiff, moist to very moist, medium dense soils that are not considered prone to soil collapse when saturated. Therefore, the Project's impact related to collapse would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

d. Would the project 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?

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[51] International Journal of Technical Innovation in Modern Engineering & Science (IJTIMES). Foundations on Collapsible and Expansive Soils: An Overview, http://ijtimes.com/papers/finished_papers/150410131426.pdf, accessed April 21, 2020.

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As provided in the Geotechnical Engineering Investigation, the on-site geologic materials are in the low to high expansion range. Specifically, the Expansion Index was found to be between 35 and 95. The Expansion Index is an indicator of the soil's swelling potential and ranges from very low (expansion index of 0 to 20), low (expansion index of 21 to 50), medium (expansion index of 51 to 90), high (expansion index of 91 to 130), and very high (expansion index of 130 or greater).[52] Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation, including structural slabs deriving support from the pile foundation system and waterproofing interior building floor slabs designed to withstand hydrostatic uplift pressure. Therefore, with adherence to existing regulations and site-specific design recommendations provided in the Geotechnical Engineering Investigation, the proposed structure is feasible from a geotechnical engineering standpoint. Impacts related to expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. While the Project site has been previously disturbed, the Project would require additional grading and excavation for the construction of the proposed subterranean parking garage, which would extend to a depth of approximately 22 feet below ground surface. Project-related excavation for the subterranean parking level and building footing may have the potential to uncover

[52] ASTM International, Standard Test Method for Expansion Index of Soils, http://terra-testing.com/wp-content/uploads/D4829.1117501-1.pdf, accessed August 19, 2020.

paleontological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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?	☒	☐	☐	☐

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

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

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

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

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potentially Significant Impact. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project site through the duration of construction. In addition, operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Therefore, the potential for construction and operation of the Project to create a significant hazard through the transport, use, and/or disposal of hazardous materials will be further evaluated in the EIR.

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

Potentially Significant Impact. The existing buildings on the Project Site proposed to be removed may contain asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs) and lead based paint (LBP). Therefore, these materials may be present on the Project Site. In addition, the Project Site is located within a Methane Zone.[53] Thus, further analysis of this topic will be provided in the EIR.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact. There are no existing schools within 0.25 mile of the Project site. However, Playa del Rey Elementary School is located approximately 0.3 mile east of the Project site at 12221 Juniette Street. While the types and amounts of hazardous materials that would be used in connection with construction and operation of the Project would be typical of those used in commercial developments, as discussed above, the Project's potential to result in the transport and disposal of hazardous materials in proximity to schools will be further analyzed in an EIR.

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

Potentially Significant Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the California Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites. As previously discussed, the Project Site is currently developed with a 23,072-square-foot office building and two accessory buildings comprised of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and an 87,881-square-foot office building at 12541 W. Beatrice Street as well as surface parking.

The Phase I ESA for the Project site to be discussed in the EIR will include a database search report that documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. Therefore, further analysis of this topic will be provided in an EIR.

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[53] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026 http://zimas.lacity.org/, accessed March 3, 2020.

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. The Project site is not located within an airport land use plan. The Project is located approximately 2 miles north of the Los Angeles International Airport. Based on a report published by the Los Angeles International Airport, the Project site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project site.[54] As a result, the Project would not expose people working on the Project site to safety hazards or excessive noise. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project site are Lincoln Boulevard (1.0 mile) to the west, SR 90 (0.1 mile) and Venice Boulevard (1.5 miles) to the north, Sepulveda Boulevard (1.2 miles) to the east, and Manchester Avenue (1.6 miles) to the south.[55] While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project site or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Specifically, during the plan check process, the Project would be subject to the review of the LAFD for compliance with emergency access requirements along with other site specific design and safety regulations prior to the issuance of building permits. After corrections are addressed from the plan check, the Project will receive approval and clearance from the LAFD and permits can be issued. An LAFD inspection will be required to determine if the Project complies with LAFD requirements during construction. Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Project site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less

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54 Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map, www.lawa.org/-/media/lawa-web/noise-management/files/150-noise-exposure/final-lax-nem-entire-report.ashx, accessed March 3, 2020.

55 City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems*, November 1996, Exhibit H.

than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project site is located in a highly urbanized area of the City. There are no wildlands located on or in the vicinity of the Project site. The Project site is also not located within a City-designated Very High Fire Hazard Severity Zone[56] or within a City-designated fire buffer zone.[57] Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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	☐	☐	☒	☐

[56] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 3, 2020. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[57] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based, in part, on the *Drainage Technical Report* (Drainage Report) prepared for the Project by Barbara Hall, dated May 2020 and included as Appendix IS-4 of this Initial Study.

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

Less Than Significant Impact. As provided by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As discussed in Section 3, Project Description, of this Initial Study, excavation for the subterranean parking levels would extend to a depth of approximately 22 feet, with the finished floor at a depth of approximately 19 feet. As provided in the Geotechnical Engineering Investigation included as Appendix IS-3 of this Initial Study, groundwater was encountered at depths between 22.5 and 30 feet below the existing site grade. In addition, based on review of the California Department of Conservation Division of

Mines and Geology Hazard Zone Report[58] for the Project site, the historic high groundwater level for the Project site was 7 feet below the ground surface. Thus, Project construction activities are expected to encounter groundwater which could require dewatering. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of site-specific BMPs included as part of the erosion control plan required to comply with the City grading permit regulations, the Project would significantly reduce or eliminate the discharge of potential pollutants from the stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project site, the Project would include the installation of capture and use or biofiltration planter BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban developments, stormwater runoff from the Project site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As discussed in the Drainage Report, the existing Project site does not have any structural or LID BMPs to treat or infiltrate stormwater. Specifically, stormwater runoff from the west parking area drains both north and west and south via sheet flow to existing driveways and

[58] USGS, Seismic Hazard Zone Report for the Venice 7.5-minute Quadrangle, https://gmw.conservation.ca.gov/SHP/EZRIM/Reports/SHZR/SHZR_036_Venice.pdf, accessed April 27, 2020.

out to Beatrice Street on the south or Jandy Street to the west. Runoff from the existing buildings drain via scuppers and downspouts to the parking lots. The east parking lot drains directly south to Beatrice Street. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project site and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities could encounter groundwater and temporary dewatering may be required. In the event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction. As such, groundwater quality would not be impacted from dewatering activities. In addition, as discussed above, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth BMPs to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of an UST. No existing USTs are anticipated to be found beneath the Project site that could require removal during construction. Notwithstanding, in the unlikely event that USTs are found, they would be removed in accordance with all applicable federal, state, and local regulations. Therefore, the removal of USTs would not pose a significant hazard on groundwater quality.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. Based on a review of the Los Angeles County Public Works Groundwater Wells inventory, groundwater Well 1281C is located approximately 0.42 mile north of the Project site.[59] However, construction activities would not be anticipated to affect this existing well due to the distance of the Project site from the well.

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[59] Los Angeles County Public Works, Groundwater Wells, https://dpw.lacounty.gov/general/wells/, accessed August 13, 2020.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, as discussed above, the Project site does not contain known existing USTs, nor would the Project introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, the Project's use of BMPs for pre-treatment of stormwater would capture pollutants that could come in contact with groundwater. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project 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. As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities could encounter groundwater and temporary dewatering may be required. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. According to the Drainage Report, the Project site is comprised of approximately 90 to 99 percent impervious surfaces under existing conditions (or an average of 94.91 percent). Therefore, the degree to which surface water infiltration and groundwater recharge would occur on-site is negligible. With implementation of the Project, the amount of landscaped area would increase, resulting in an overall decrease in the amount of impervious surfaces on the Project site to approximately 93 and 96 percent (or an average of 94.55 percent). The increase in pervious areas would improve the groundwater recharge capacity of the Project site over existing conditions. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table level. Therefore, impacts on groundwater supplies would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river 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. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project site by exposing the underlying soils, modifying flow direction, and making the Project site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As discussed in the Drainage Report, the Project site is comprised of approximately 90 percent impervious surfaces in Drainage Area 1 and 99 percent impervious surfaces in Drainage Area 2 under existing conditions (or an average of 94.91 percent). With implementation of the Project, the amount of landscaped area would increase, resulting in an overall decrease in the amount of impervious surfaces on the Project site to approximately 93 percent in Drainage Area 1 and 96 percent in Drainage Area 2 (or an average of 94.55 percent). As such, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project site by exposing the underlying soils, modifying flow direction, and making the Project site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As discussed in the Drainage Report, the Project site is comprised of approximately 90 percent impervious surfaces in Drainage Area 1 and 99 percent impervious surfaces in Drainage Area 2 under existing conditions (or an average of 94.91 percent). With implementation of the Project, the amount of landscaped area would increase, resulting in an overall decrease in the amount of impervious surfaces on the Project site to approximately 93 percent in Drainage Area 1 and 96 percent in Drainage Area 2 (or an average of 94.55 percent). This overall increase in pervious surfaces would result in an overall reduction in stormwater runoff. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Therefore, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding area such that on-site or off-site flooding would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As discussed in the Drainage Report, stormwater runoff from the west parking area drains both north and west and south via sheet flow to existing driveways and out to Beatrice Street on the south or Jandy Street to the west. Runoff from the existing buildings drain via scuppers and downspouts to the parking lots. The east parking lot drains directly south to Beatrice Street. A City of Los Angeles storm drain exists in Jandy Street which conveys runoff from the Project site to the Centinela Creek, which is north of the Project Site and is fully improved. As discussed above, development of the Project would result in an increase in the landscaped areas throughout the Project site and would result in an overall reduction in the amount of impervious surfaces on the Project site. Accordingly, there would be an overall decrease in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[60,61] A review of the Federal Emergency Management Agency flood insurance rate maps (FEMA MAP NUMBER 06037C1760F, effective on 09/26/2008) indicates that the Project site is located within Zone X, area of minimal flood hazard. Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed above, the Project site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project site as being located within a flood control basin or within a potential inundation area.[62] The Project site is located approximately 2.6 miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project site as being located within an area potentially affected by a tsunami.[63] Therefore, no tsunami or tsunami events would be expected to impact the Project site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). A TMDL is the calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet and continue to meet water quality standards for that particular pollutant. A TMDL determines a pollutant reduction target and allocates load reductions necessary to the source(s) of the pollutant.[64] The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. The objective of the EWMP Plan is to determine the network of control measures (often referred to as best management practices) that will achieve required

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60 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1760F, effective September 26, 2008.

61 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

62 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

63 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

64 United States Environmental Protection Agency, Impaired Waters and TMDLs, Overview of Total Maximum Daily Loads (TMDLs), www.epa.gov/tmdl/overview-total-maximum-daily-loads-tmdls, accessed August 13, 2020.

pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

The Project site, located in the Centinela Creek watershed, falls within the Ballona Creek EWMP and ultimately discharges into the Pacific Ocean at the Santa Monica Bay. According to the State Water Resources Control Board (SWRCB), Ballona Creek is listed as an impaired water body. Impairments for Ballona Creek Reach 2 include trash, toxic pollutants, bacteria, metals, and sediment.[65] Potential pollutants generated by the Project would be typical of office and commercial land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project site does not currently have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for Ballona Creek. In addition, development of the Project would result in an increase in the landscaped areas and would reduce the overall impervious surface area on the Project site. The increase in pervious areas would improve the groundwater recharge capacity of the Project site over existing conditions. Since the Project's LID BMP design is for biofiltration, treated runoff would be discharged into the storm drain system, away from the structures and groundwater table.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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. Would the project physically divide an established community?

[65] California Environmental Protection Agency, State Water Resources Control Board, Impaired Water Bodies, www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml?wbid=CAT405170002000030110195 1, accessed June 10, 2020.

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project site is located within a generally commercial office and industrial area and is bounded by office uses and surface parking immediately to the north, with State Route 90 (SR 90) located further north; office and surface and structure parking immediately to the east with Grosvenor Boulevard located further east; Beatrice Street to the south; and Jandy Place to the west. Across Beatrice to the south is a five-story apartment building; across Jandy Place to the west are converted warehouse structures used for office uses and surface parking. The Project site is currently developed with an office building and two accessory buildings at 12575 W. Beatrice Street and an office building at 12541 W. Beatrice Street, as well as surface parking.

The Project would replace the existing structures at 12575 W. Beatrice Street with a new office building. The existing office building at 12541 W. Beatrice Street would remain. As part of the Project, the existing lot lines would be adjusted to accommodate a corner landscaped parcel, a building site for the construction of the proposed new building (at 12575 W. Beatrice Street, 12553–12575 W. Beatrice Street, and 5410–5454 S. Jandy Place), and a parcel for the existing building (at 12541 W. Beatrice Street). When the lot line adjustment is complete, the lot at 12575 W. Beatrice Street would contain approximately 103,281 square feet (2.37 acres) and the lot at 12541 W. Beatrice Street would contain approximately 93,182 square feet (2.14 acres). An approximately 389-square-foot lot would also be created at the corner of Jandy Place and Beatrice Street for landscaping and open space purposes. All proposed development would occur within the boundaries of the Project site, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. The proposed office and commercial uses would also be consistent with the uses already on the Project site and immediately surrounding the Project site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project site. The Project site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project site is not located within a mineral producing area as classified by the California Geological Survey,[66] or within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present.[67] The Project site is also not located within a City-designated oil field or oil drilling area.[68,69] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project site. Furthermore, as discussed above, the Project site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey. The Project site is also not located within a City designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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66 California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

67 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

68 City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed March 5, 2020.

69 California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#close/-118.41451/33.97878/16, accessed August 13, 2020.

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?	☐	☐	☒	☐

a. Would the project 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?

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

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

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

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?

Less Than Significant Impact. The Project site is not located within the vicinity of a private airstrip or airport land use plan. The Project is, however, located approximately 2 miles north of the Los Angeles International Airport. As discussed above, based on a report published by the Los Angeles International

Airport, the Project site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project site.[70] Therefore, the Project would not expose people residing or working in the project area to excessive airport noise. Impacts would be less than significant, and no further evaluation of this topic is required.

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. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would include the construction of new office and commercial uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project site or the Palms–Mar Vista–Del Rey Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial unplanned population growth.

As previously discussed, the Project includes the construction of a new office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. As part of the Project, the existing 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street would be

[70] Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map, www.lawa.org/-/media/lawa-web/noise-management/files/150-noise-exposure/final-lax-nem-entire-report.ashx, accessed March 3, 2020.

removed while the existing 87,881-square-foot office building at 12541 W. Beatrice Street would be retained. Upon completion, the Project would result in a net new floor area of 169,240 square feet on the Project site. Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate a net increase of 670 new employees on the Project Site.[71] As noted above, the Project would not introduce new homes at the Project site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project site, this potential increase in population would not be substantial since not all employees would move close to the Project site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project site and other persons would commute to the Project site from other communities in and outside of the City. According to SCAG's 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,831,457 employees.[72] As projected by the 2016–2040 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,898,986 employees in 2024, the projected occupancy year of the Project.[73] Therefore, the projected employment growth in the City between 2020 and 2024 based on SCAG's 2016–2040 RTP/SCS is approximately 67,529 employees. Thus, the Project's estimated 670 new employees would constitute approximately 0.99 percent of the employment growth forecasted in SCAG's 2016–2040 RTP/SCS between 2020 and 2024. According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[74] In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,927,638 employees.[75] Therefore, the projected employment growth in the City between 2020 and 2024 based on SCAG's 2020–2045 RTP/SCS is approximately 39,669 employees. Thus, the Project's estimated 670 new employees would constitute approximately 1.7 percent of the employment growth forecasted between 2020 and 2024.

Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled

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71 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 199,500 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.

72 The 2020 interpolated value is calculated using SCAG's 2012 and 2040 values to find the average employment increase between years and then applying that annual increase to 2012: [(2,169,100 – 1,696,400) ÷ 28] × 8 + 1,696,400 = 1,831,457.

73 The 2024 interpolated value is calculated using SCAG's 2012 and 2040 values to find the average employment increase between years and then applying that annual increase to 2012: [(2,169,100 – 1,696,400) ÷ 28] × 12 + 1,696,400 = 1,898,986.

74 SCAG. ConnectSoCal (2020-045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2020 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 4] + 1,848,300 = ~ 1,887,969.

75 SCAG. ConnectSoCal (2020-045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2024 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 8] + 1,848,300 = ~ 1,927,638.

by people already residing in the vicinity of the Project site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial unplanned population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently occupied by commercial uses and no housing currently exists on the Project site. The Project would not displace any existing people or housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?	☐	☐	☒	☐

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project site. The Project would increase the building square footage on-site and would introduce new commercial and office uses, which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. Police protection for the Project site is provided by the City of Los Angeles Police Department. The Project would introduce new commercial and office uses to the Project Site, which could result in the need for additional police services. Therefore, the EIR will provide further analysis of this issue.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.[76] The Project site is located in Local District–West.[77] Nearby schools include Playa del Rey Elementary School, located approximately 0.3 mile east of the Project site at 12221 Juniette Street, Marina Del Rey Middle School, located approximately 0.33 mile north of the Project site at 12500 Braddock Drive, and Venice High School, located approximately 2.8 miles northwest of the Project site at 13000 Venice Boulevard.[78] Furthermore, based on the 2020 LAUSD Developer Justification Study, the Project would be anticipated to generate approximately 189 students.[79] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, it is anticipated that not all new employees of the Project would relocate to the vicinity of the Project site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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76 Los Angeles Unified School District, Local District Maps 2015–2016, http://achieve.lausd.net/Page/8652, accessed March 10, 2020.

77 Los Angeles Unified School District, Local District - West Map, https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22573&dataid=24308&FileName=West.pdf, accessed March 10, 2020.

78 Los Angeles Unified School District. Resident School Identifier, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed October 2, 2020.

79 Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 15. Based on the "Standard Commercial Office" rate of 1.128/1,000 sf and the "Neighborhood Shopping" rate of 0.638 students/1,000 sf. The existing office use to be removed would generate 34 students (30,260 sf x 0.001128) = 34 students. The proposed office and commercial uses would generate 223 students: (196,100 sf x 0.001128) = 221 students for the office uses and (3,400 sf x 0.000638) = 2 students for the proposed commercial uses. The Project results in a net new increase of 189 students (223 students – 34 students).

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project site include: Glen Alla Park (located 0.9 mile north of the Project site); Culver Slauson Park and Recreation Center (located 1.02 miles northeast of the Project site); Westchester Skate Park and Tennis Courts (located 1.49 miles south of the Project site); Westchester Senior Citizen Center (located 1.56 miles south of the Project site); Westchester Recreation Center (located 1.61 miles south of the Project site); Westchester Pool (located 1.62 miles south of the Project site); and Venice High School Indoor Pool (located 1.90 miles north of the Project site).[80]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project site who already utilize existing parks and recreational facilities. Therefore, only a portion of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site open space amenities such as landscaped courtyards with seating for use by employees, reducing the likelihood employees would use local parks. Specifically, the Project proposes approximately 38,033 square feet of landscaped area (e.g., trees, green space, etc.) and 54,583 square feet of hardscape area (e.g., courtyards, pathways, etc.) throughout the Project Site and on the building terraces on the upper levels of the proposed building. The Project would provide an internal landscaped courtyard between the proposed building at 12575 W. Beatrice Street and the existing commercial building at 12541 W. Beatrice Street lined with seating areas, trees, and landscaped area providing outdoor open space areas for tenants of both buildings. New hardscape and landscaped area would also be added to the northeastern portion of 12541 W. Beatrice Street in a new courtyard area with seating, and new trees would be planted along Beatrice Street and the perimeter of the 12541 W. Beatrice Street building creating a separation between the building and the existing surface parking lot. New street trees along Jandy Place would be planted as part of the Project, and a new landscaped seating area would be provided along Jandy Place, which is proposed to provide streetscape improvements, including pedestrian seating. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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[80] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=33.9811315&geo[longitude]=-118.4158548&address=12575%20Beatrice%20St,%20Los%20Angeles,%20CA%2090066,%20USA, accessed March 10, 2020.

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

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.[81] The Project area is served by existing libraries within the Palms-Mar Vista-Del Rey Community Plan area, including the Mar Vista Branch Library, located 1.8 miles north of the Project site.[82]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the Mar Vista Branch Library. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, the net addition of 670 Project employees would be more likely to use library facilities near their homes during non-work hours, and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Since there is no residential component to the Project, the only potential new library visitors, if any, would be employees or visitors to the Project Site. The addition of 670 new employees to the Project Site would not materially change demand on local libraries. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Further, Measure L (City ballot measure passed in 2011) has provided funds to restore adequate services to the existing library system, restore service hours, and provided funds to purchase additional books and materials that were cut in the recession during 2010 and 2011.[83] Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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81 Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020, www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf, accessed March 10, 2020.

82 Los Angeles Public Library, Locations and Hours, www.lapl.org/branches?distance%5Bpostal_code%5D=90066&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed March 10, 2020.

83 Los Angeles Public Library, Measure L, www.lapl.org/measure-l, accessed October 2, 2020.

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. As discussed above in Checklist Question XV.(d), the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project site who already utilize existing parks and recreational facilities. Therefore, only a portion of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. There are several park facilities in proximity to the Project site such as Glen Alla Park (located 0.9 mile north of the Project site), Culver Slauson Park and Recreation Center (located 1.02 miles northeast of the Project site), and the Westchester Skate Park and Tennis Courts (located 1.49 miles south of the Project site). Any employee use of nearby parks and recreational facilities would likely be split among those facilities, thereby not resulting in the physical deterioration of any one facility. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, the Project proposes approximately 38,033 square feet of landscaped area (e.g., trees, green space, etc.) and 54,583 square feet of hardscape area (e.g., courtyards, pathways, etc.) throughout the Project site that will reduce the demand for nearby parks and/or recreational facilities. The Project proposes on-site open space amenities such as landscaped courtyards with seating for use by employees, reducing the likelihood employees would use local parks, which would reduce a demand on nearby parks and/or recreational facilities. Therefore, the impact on parks and recreational facilities would be less than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. The Project would provide an internal landscaped courtyard between the proposed building at 12575 W. Beatrice Street and the existing commercial building at 12541 W. Beatrice Street lined with seating areas, trees, and landscaped area providing outdoor open space areas for tenants of both buildings. Also, new seating and landscaped areas would be added to the northern portion of 12541 W. Beatrice Street and new trees would be planted along the perimeter of the 12541 W. Beatrice Street building creating a separation between the building and the existing surface parking lot. New street trees along Jandy Place would be planted as part of the Project, and a new landscaped seating area would be provided along Jandy Place, which is proposed to provide streetscape improvements, including pedestrian seating. These Project features have been incorporated into the overall Project design. The construction of these recreational facilities as part of the Project would take place at the same time as the rest of the construction processes and would have no additional adverse physical effects on the environment as discussed in Public Services Checklist Question XV.d. Therefore, no impacts regarding construction or expansion of recreational facilities would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. Operation of the proposed uses would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's roadways could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the state's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2020), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

The Project would develop new office and commercial uses on the Project site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. The roadways adjacent to the Project site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. The Project site is located in a highly urbanized area developed with roadways and infrastructure, and at the intersection of two roadways terminating in cul-de-sacs. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial and office uses already present in the surrounding area. However, the EIR will address any potential hazards due to the Project access in relation to the adjacent roadways and cul-de-sacs.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact. As discussed above, the Project Site is located at the intersection of two roadways terminating in cul-de-sacs. While the Project is anticipated to be designed in accordance with applicable emergency access requirements, the unique roadway configuration adjacent to the Project Site as it relates to emergency access will be evaluated further in an EIR.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), 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)?

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?

Potentially Significant Impact (a and b). Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require grading, excavation to a depth of approximately 22 feet below ground surface, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. This notice will specify any changes to the Project that occurred since the previous notification to aid review. Further analysis of this topic will be provided in the EIR.

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?	☐	☐	☒	☐
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. Would the project 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?

Potentially Significant Impact. Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. As discussed below, the Project would not result in a significant impact with respect to wastewater treatment, stormwater drainage, or telecommunications facilities.

With regard to water facilities/infrastructure, while domestic water demand is typically the main contributor to operational water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore, are the primary means for analyzing water infrastructure capacity. As discussed above in Checklist Section XV, Public Services, the Project's potential impacts regarding fire protection services will be further analyzed in the Draft EIR. Therefore, the Project's fire flow requirements would be determined by LAFD during the EIR consultation process. Accordingly, further analysis of the Project's potential impacts to water infrastructure will be provided in the EIR.

As discussed above in Checklist Question VI.a, due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power and the Southern California Gas Company, respectively. Therefore, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[84] and current average wastewater flows are at approximately 275 mgd.[85] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 2 on page 71, the Project would generate a net increase in wastewater flow from the Project site of approximately 29,182 gpd, or approximately 0.029 mgd. The Project's increase in average daily wastewater flow of 0.029 mgd would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant. Furthermore, wastewater flows would be typical of office and commercial developments. No industrial discharge into the wastewater system would occur. Discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LASAN monitors the treated wastewater, wastewater generated from the Project site would not exceed wastewater treatment requirements of LARWQCB.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project site. Based on the Wastewater Service Information letter provided by LASAN, included in the Utility Technical Report provided in Appendix IS-5 of this Initial Study, the sewer infrastructure in the vicinity of the Project site includes an existing 8-inch line on Beatrice Street. The sewage from the existing 8-inch line feeds into a 12-inch line on Jandy Place then into a 30-inch line on McConnell Avenue before discharging into a 42-inch sewer line on Jefferson Boulevard. As determined by LASAN in their Wastewater Service Information letter, based the estimated flows of the Project, it is anticipated that the sewer system surrounding the Project site might be able to accommodate the total flow for the Project. In addition, ultimately, the Project's sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Project. As required by LAMC

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84 LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed January 2, 2020.

85 LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afrLoop=3950078628628745#!, accessed January 2, 2020.

Table 2
Estimated Project Wastewater Generation

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
EXISTING TO BE REMOVED			
Existing Structures to be Removed (Office)	30,260 sf	0.17	5,144
Total Existing			***5,144***
PROPOSED			
Office	196,100 sf	0.17	33,337
Café	1,300 sf	0.72	936
Retail	2,100 sf	0.025	53
Proposed Wastewater Generation			**34,326**
Less Existing to be Removed			(5,144)
Net Additional Wastewater Generation (Proposed – Existing to be Removed)			**29,182**

sf = square feet

gpd = gallons per day

[a] *Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.*

Source: City of Los Angeles, Bureau of Sanitation, Request for Wastewater Service Information, September 2020; Eyestone Environmental, 2020.

Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer system. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Stormwater drainage

With regard to stormwater drainage, as discussed above in Response to Checklist Question X.c.ii, the Project would result in an overall decrease in impervious surface area and stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. No further analysis of this issue in an EIR is required.

Telecommunications Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would ensure safe pedestrian access is maintained throughout construction, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers and the City, as applicable. Therefore, related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project 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. LADWP supplies water to the Project Site. As described in Section 3, Project Description, of this Initial Study, the Project includes the construction of a new office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. As part of the Project, the existing 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street would be removed while the existing 87,881-square-foot office building at 12541 W. Beatrice Street would be retained. Upon completion, the Project would result in a net new floor area of 169,240 square feet on the Project Site. Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site.

Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand to the proposed uses. As shown in Table 3 on page 73, assuming constant water use throughout the year, the Project would result in a net average daily water demand of 34,336 gallons per day.

The 2015 Urban Water Management Plan forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. Furthermore, as outlined in the 2015 Urban Water Management Plan, LADWP is committed to providing a reliable water supply for the City. The 2015 Urban Water Management Plan takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2015 Urban Water Management Plan also furthers the goals of the City's Executive Directive No. 5 and Sustainable City pLAn. The 2015 Urban Water Management Plan also addresses the

Table 3
Estimated Project Water Demand

Land Use	Floor Area	Water Demand Rate (gpd/unit)[a]	Water Demand (gpd)
EXISTING TO BE REMOVED			
Existing Structures to be Removed (Office)	30,260 sf	0.2	6,052
Total Existing			***6,052***
PROPOSED			
Office	196,100 sf	0.2	39,220
Café	1,300	0.85	1,105
Retail	2,100 sf	0.03	63
Proposed Water Demand			**40,388**
Less Existing to be Removed			(6,052)
Net Additional Water Demand (Proposed – Existing to be Removed)			**34,336**

sf = square feet

gpd = gallons per day

[a] *Water demand rates are based on 2012 LASAN Sewer Generation Rates conservatively increased by 18 percent.*

Source: City of Los Angeles, Bureau of Sanitation, Request for Wastewater Service Information, September 2020; Barbara L. Hall, Utility Technical Report, October 2020, included in Appendix IS-5 of this Initial Study; Eyestone Environmental, 2020.

current and future State Water Project supply shortages and concludes that MWD's actions in response to the threats to the State Water Project would ensure continued reliability of its water deliveries.

By focusing on demand reduction and alternative sources of water supplies, LADWP would further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands in the City.

The 2015 Urban Water Management Plan utilized SCAG's 2012–2035 RTP data that provide for reliable water demand forecasts, taking into account changes in population, housing units, and employment. As discussed above, the Project would not generate a new residential or household population on the Project site and would therefore not result in a direct population growth in the area. In addition, as provided above in Checklist Section XIV, Population and Housing, while some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project site, this potential increase in population would not be substantial since not all employees would move close to the Project site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project site and other persons would commute to the Project site from other communities in and outside of the City. Additionally, the Project's estimated 670 new employees would constitute up to approximately 1.7 percent of the employment growth forecasted by SCAG between 2020 and 2024. Therefore, the Project would be well within SCAG's growth projections for the City of Los Angeles Subregion.

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As shown in Table 2 on page 71, the Project would generate a net increase in wastewater flow from the Project Site of approximately 29,182 gpd, or approximately 0.029 mgd. The Project's increase in average daily wastewater flow of 0.029 mgd would represent approximately 0.02 percent of the current 175 mgd of remaining available capacity of the HWRP. Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2024, the year by which construction of the Project is expected to be completed. The City has developed the One Water LA 2040 Plan, which includes a collaborative approach to develop an integrated framework for managing the City's water resources, watersheds, and water and wastewater facilities in an environmentally, economically, and socially beneficial manner. This includes the Final Draft Wastewater Facilities Plan. The purpose of the Wastewater Facilities Plan is to guide the Los Angeles Bureau of Sanitation with its decision-making related to the implementation of system improvements to its wastewater collection and treatment facilities through 2040. The Wastewater Facilities Plan provides the underlying documentation to make informed decisions when considering investments to repair, replace, or enhance existing facilities and construct new water conveyance and treatment facilities required to serve the City's needs through 2040.[86] Future updates to the One Water LA 2040 Plan and the accompanying Wastewater Facilities Plan would provide for improvements beyond 2040 to serve future population needs. It is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2024. Thus, based on this conservative assumption, the 2024 effective capacity of the Hyperion Sanitary Sewer System would continue to be 550 mgd. Similarly, the capacity of the HWRP in 2024 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2024, the Project build-out year, would be approximately 264 mgd.[87] Accordingly, the future remaining available capacity of the HWRP in 2024 would be approximately 186 mgd. The Project's increase in average daily wastewater flow of 0.029 mgd would represent approximately 0.016 percent of the estimated future

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86 LASAN, One Water LA 2040 Plan, Vol. 2—Final Draft Wastewater Facilities Plan, April 2018.

87 Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2024 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 4] + 256 = ~ 264 mgd.

remaining available capacity of 186 mgd at the HWRP.[88] Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.029 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent[89] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.029 mgd plus the projected flows of approximately 264 mgd to the HWRP would also represent approximately 58.7 percent[90] of the HWRP's assumed future capacity of 450 mgd.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. Furthermore, based on the Wastewater Service Information letter provided by LASAN, included in the Utility Report provided in Appendix IS-5 of this Initial Study, the Hyperion Water Reclamation Plant has sufficient capacity for the Project. As such, the Project would 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. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

d. Would the project 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. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[91] Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[92] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

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88 (29,182 gpd ÷ 186 mgd) x 100 = 0.016 %

89 [(29,182 gpd + 275 mgd) ÷ 450 mgd] x 100 = ~ 61.1%

90 [(29,182 gpd + 264 mgd) ÷ 450 mgd] x 100 = ~ 58.7%

91 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

92 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

Based on 2018 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 163.39 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 57.72 million tons of remaining capacity and an average daily in-County disposal rate of 1,148 tons per day.[93] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[94]

Based on the 2018 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2033 will not exceed the 2018 remaining permitted Class III landfill capacity of 163.39 million tons. The 2018 CoIWMP Annual Report evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six scenarios using in-county and out-of-county landfills. Only the scenario using in-county disposal capacity only would result in a shortfall. The 2018 CoIWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[95] The City of Los Angeles is currently diverting 76 percent of its waste from landfills.[96] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

Construction

As previously discussed, construction of the Project would include the removal of 30,260 square feet of office uses within the Project Site and the development of 199,500 square feet floor area consisting of 196,100 square feet of office space and 3,400 square feet of commercial space. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5

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93 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

94 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

95 City of Los Angeles, Solid Waste Integrated Resource Plan FAQ, www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed April 15, 2020.

96 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed April 9, 2019.

(Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 4 on page 78, based on construction and debris rates established by the USEPA and after accounting for mandatory recycling, the Project would generate approximately 683 tons of construction-related waste. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 57.72 million tons, as well as the remaining 163.39 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Based on the above, Project construction would not 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. Therefore, construction impacts to solid waste facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As shown in Table 5 on page 79, upon full buildout, the Project would result in a net increase in solid waste generation of 1,287 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[97] The estimated net increase in solid waste that would be generated by the Project represents approximately 0.00079 percent of the remaining capacity (163.39 million tons) for the Class III landfills serving the County.[98]

The County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts,

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97 LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3608041245788654&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3608041245788654%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed April 15, 2020.

98 (1,287 tons per year/163.39 million tons) x 100 ≈ 0.00079%

Table 4
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Construction Waste			
Office	196,100 sf	3.89	381.4
Commercial	3,400 sf	3.89	6.6
Construction Waste Subtotal			388
Demolition Waste			
Office	30,260 sf	155	2,345
Demolition Waste Subtotal			
Total for Construction and Demolition Waste			***2,733***
Total After 75-Percent Recycling			**683.3**

du = dwelling unit

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4, and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

Source: Eyestone Environmental, 2020.

together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2018 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2018 Annual Report to adequately meet countywide disposal needs through 2033 without capacity shortages.

Based on the above, the landfills that serve the Project site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by AB 939, the California Integrated Waste Management Act of 1989, 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

Table 5
Estimated Project Solid Waste Generation

Building	Size	Estimated No. of Employees	Solid Waste Generation Rate[a]	Total Generation (tons/year)
Existing				
Office	30,260 sf[b]	121 emp	10.53/lbs/emp/day	233
Total Existing				**233**
Proposed				
Commercial (office and commercial)	199,500 sf	791 emp[c]	10.53/lbs/emp/day	1,520
Total Proposed				**1,520**
Total Net Increase				**1,287**

du = dwelling unit

emp = employees

lbs = pounds

sf = square feet

[a] *Commercial solid waste generation rate is from the City's L.A. City CEQA Thresholds Guide. The L.A. CEQA Thresholds Guide does not include a generation factor for office uses; hence, the commercial rate was used.*

[b] *This includes the two accessory structures that are currently on 12575 Beatrice Street.*

[c] *Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate a net increase of 670 new employees on the Project Site. The existing office uses to be removed produces 121 employees (30,260 square feet x 0.004 = 121). The Project would produce 791 employees (office 199,500 square feet x 0.004 = 784) + (retail 3,400 square feet x 0.002 = 7).*

Source: Eyestone Environmental, 2020.

and loading of recyclable materials in development projects. Furthermore, 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 plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[99] 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 were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

[99] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the 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.[100] The Project's on-site recycling area is located adjacent to the loading area on the ground floor level and is accessed from the service drive along the north side of the property. The 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 Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

[100] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

c. Would the project 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. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (a–d). As discussed above, the Project site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project site. The Project site is not located within a City-designated Very High Fire Hazard Severity Zone,[101] nor is it located within a City-designated fire buffer zone.[102] Therefore, the Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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?	☒	☐	☐	☐

[101] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026, http://zimas.lacity.org/, accessed March 3, 2020. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[102] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

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?

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project site. Therefore, the Project would not have the potential to 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.

As discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: aesthetics; air quality; cultural resources (archaeological resources); energy, including energy infrastructure; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water infrastructure and energy).

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

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

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

While impacts to historic resources tend to be site-specific, cumulative impacts could occur if several projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project would not result in any significant impacts to historic resources.

Specifically, none of the buildings on-site that would be removed by the Project are historical resources and therefore the Project would not result in direct impacts to historical resources. In addition, none of the adjacent sites have been designated as historical resources. The Project site and surrounding area also are not located within an existing Historic Preservation Overlay Zone. Therefore, there are no historic resources within and adjacent to the Project site. Thus, the Project would not contribute to any cumulative impacts associated with historic resources. Furthermore, it is anticipated that historical resources that may potentially be affected by other development projects would be subject to the same CEQA requirements as the Project and be evaluated as part of that project's environmental documentation. The determinations regarding impacts to historical resources from other development projects would be made on a case-by-case basis and the effects of cumulative development on historical resources would be mitigated to the extent feasible. Therefore, Project impacts with respect to historic resources in the vicinity of the Project site would not be cumulatively considerable, and cumulative impacts to historical resources would be less than significant.

As analyzed above, except for the potential to discover unknown paleontological resources, the Project would not result in significant impacts to geology and soils. Thus, except for the potential to discover unknown paleontological resources, the Project would not contribute to any cumulative impacts associated with geology and soils. In addition, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soils. Specifically, since there are no known faults beneath the Project Site, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to rupture of a known earthquake fault. Furthermore, even though the Project would involve excavation for the underground parking levels, the proposed development would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. The Project site is also located in a highly urbanized and fully developed area and these existing environmental conditions are not such that strong seismic ground shaking would be exacerbated by the Project. Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area, rather than on a cumulative basis. Nonetheless, cumulative growth through the Project's anticipated build-out year could expose a greater number of people to potential seismic hazards. As with the Project, related projects and other future development projects would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and Los Angeles Building Code as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular related project site. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. With adherence to applicable regulations and any site-specific recommendations set forth in a site-specific geotechnical evaluation, cumulative impacts related to geological and soils conditions would be less than significant.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality, including as

required by the City's LID program. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, while the Project would not include residential uses, some related projects could include residential uses that would directly generate a new population and provide additional housing in the vicinity of the Project site. It is anticipated that with the ongoing update of the Palms–Mar Vista–Del Rey Community Plan, the potential population and housing growth in the area, including from related projects would be considered. Other related projects like the Project would not include residential uses that would directly contribute to population growth. As with the Project, such related projects could also generate an increased demand for housing in the area due to the relocation of housing by employees in proximity to their place of work. As with the Project, such demand for housing in the area would be anticipated to be limited as some employees may already live in the area and other employees would chose to commute. To the extent employees decide to relocate to the area, such demand for housing would be met by existing vacancies and by other related projects that include residential uses. Notwithstanding, as discussed above in Checklist Section XIV, Population and Housing, the provision of new jobs as part of the Project would constitute a small percentage of employment growth and would not be considered unplanned growth and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. With regard to the displacement of housing or people, while the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.

With regard to public services such as schools, parks, libraries, and recreation, the Project would not generate a residential population that could increase the demand for schools, parks and recreational facilities, and libraries. Therefore, the Project would not contribute to an increased demand for these services. Other related projects could increase the demand for these services and facilities. However, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. Specifically, in the case of schools, the Project and the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreation (i.e., existing neighborhood and regional parks), projects would be required by the LAMC to include open space and amenity spaces (e.g. gyms, outdoor decks with pools, etc.) and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project 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 park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for

park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, libraries, and recreation. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Due to the shared urban infrastructure, the Project and related projects would cumulatively increase water consumption, wastewater generation, and stormwater discharge. As concluded in LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Further, with respect to additional growth within the LADWP service area, through LADWP's UWMP process, the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, LADWP would be able to supply the demands of the Project and projected future growth through 2040 and beyond. In addition, in accordance with the City's Green Building Ordinance, certain water conservation measures are required to be implemented by the City. Such measures would reduce water use associated with the Project and related projects. Furthermore, certain large related projects meeting the thresholds under Senate Bill 610 would be required to prepare and receive LADWP approval of a Water Supply Assessment that demonstrates how the project's water demand will be met. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to water supply. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Development of the related projects would result in an increase in the demand for sanitary sewer service in LA Sanitation's HWRP. As described above in Response to Checklist Question No. XIX.a, the existing design capacity of the HWRP is approximately 450 mgd and current wastewater flow levels are at 275 mgd. Based on the future wastewater flow and the wastewater treatment capacity of the HWRP, sufficient wastewater treatment capacity would be available to serve the Project and related projects. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects occurring in the vicinity of the Project site, including the related projects, would also be required to coordinate with LASAN via a sewer capacity availability request to determine adequate sewer capacity. Furthermore, new development projects would be subject to Los Angeles Municipal Code Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to stormwater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Development of the Project and related projects could require new or expanded telecommunications infrastructure. As with the Project, the installation of any required telecommunications infrastructure associated with the related projects would occur during a relatively short duration and would be limited to

on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan annual reports. Each annual Countywide Integrated Waste Management Plan report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2018 Countywide Integrated Waste Management Plan Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2033) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual Countywide Integrated Waste Management Plan provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

As discussed above, the Project site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and 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?

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