



CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Environmental Case No.: ENV-2016-2364-MND and Related Case No.: CPC-2016-2363-DB-SPR

Project Title: Santa Monica/Granville Mixed Use Project

Council District No. 11

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE  
DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

**Project Addresses:** 1500 Granville Avenue, Los Angeles, CA 90025 (11752, 11760, 11768-11770, and 11776 West Santa Monica Boulevard, 1511-1513 South Stoner Avenue, and 1514 and 1514 ½ South Granville Avenue)

**Project Description:** The Project Site is located on the south side of Santa Monica Boulevard, between Granville Avenue to the west and Stoner Avenue to the east, in the City of Los Angeles, 90025. The Site is approximately 0.5 mile east of the City of Santa Monica border at Centinela Avenue. The Site's total area is approximately 58,381 square feet (or 1.34 acres). The Site is in the West Los Angeles Community Plan Area, zoned C2-1VL (Commercial Zone, Height District 1-Very Limited), and the General Plan land use designation is General Commercial. The Project Site contains a collection of structures, most recently utilized as an auto dealership and service center (operated as Buerge Chrysler) totaling approximately 24,684 square feet, with surface parking.

The Project would demolish all existing structure and eliminate all uses. The Project would be a development with approximately 154 residential units and approximately 6,011 square feet of restaurant and 9,106 square feet of retail. The building would be situated on two levels of subterranean parking; a ground level with parking, restaurant, retail, and live/work units; and 4 upper residential levels situated around courtyards/pool deck.

The Project will require approval of the following discretionary actions: 1) On-menu incentive for a Floor Area Ratio of 3.0:1 in lieu of the 1.5:1 otherwise permitted in the C2-1VL zone as permitted by LAMC Section 12.22.A.25(f)(4)(ii); 2) Off-menu incentive to allow a height of 5 stories and 56 feet in lieu of the 3 stories and 45 feet otherwise permitted in the C2-1VL zone for a mixed use project as permitted by LAMC Section 12.22.A.25.G(3); 3) Pursuant to Section 16.05, Site Plan Review to allow a development consisting of 15,117 square feet of retail and 154 dwelling units; 4) Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, and building permits. Ministerial Request: A 28.9% Density Bonus as permitted by LAMC Section 12.22 A 25(c)(1) and Parking Option 1 as permitted by LAMC Section 12.22 A 25(d)(1).

**APPLICANT:**

S. Santa Monica/E. Granville (LA), Owner, LLC

**PREPARED FOR:**

Los Angeles Department of City Planning

**PREPARED BY:**

CAJA Environmental Services, LLC

SIGNATURE (OFFICIAL)

DATE

APRIL 12, 2017

## CITY OF LOS ANGELES

### CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

#### DETERMINATION: (To be completed by the Lead Agency)

##### On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that 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 the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

May Sirinopwongsagon

MARCH 16, 17

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

##### BACKGROUND

##### PROPONENT NAME

S. Santa Monica/E. Granville (LA), Owner, LLC

##### PHONE NUMBER

(323) 860-4900

##### PROPONENT ADDRESS

4700 Wilshire Boulevard, Los Angeles, CA 90010

##### AGENCY REQUIRING CHECKLIST

City of Los Angeles Department of City Planning

##### DATE SUBMITTED

March 2017

##### PROPOSAL NAME (If Applicable)

Santa Monica-Granville Project

**ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> 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 mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a. 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5. CULTURAL RESOURCES:</b> Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6. GEOLOGY AND SOILS.</b> Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Mines and Geology Special Publication 42.				
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>7. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>8. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>9.</b>	<b>HYDROLOGY AND WATER QUALITY.</b> Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?				
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j.	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10.</b>	<b>LAND USE AND PLANNING.</b> Would the project:				
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11.</b>	<b>MINERAL RESOURCES.</b> Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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<b>12. NOISE.</b> Would the project:				
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>13. POPULATION AND HOUSING.</b> Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>14. PUBLIC SERVICES.</b>				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>15. RECREATION.</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16. TRANSPORTATION AND TRAFFIC.</b> Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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in substantial safety risks?				
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>17. TRIBAL CULTURAL RESOURCES.</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. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>18. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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environmental effects?				
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>19. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Mitigation Measures**

### **1. Aesthetics**

No mitigation measures required.

### **2. Agricultural and Forestry Resources**

No mitigation measures required.

### **3. Air Quality**

**MM-3-1** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by ARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided to the Department of Building and Safety.

### **4. Biological Resources**

#### **MM-4-1 Tree Removal (Public Right-of-Way)**

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24- inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

### **5. Cultural Resources**

No mitigation measures required.

## **6. Geology and Soils**

### **MM-6-1 Geotechnical Report and Approval Letters**

- The Project shall comply with the recommendations contained within the geotechnical report and fault rupture report.
- The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letters for the Project, and as they may be subsequently amended or modified. All recommendations of the geotechnical report and fault rupture report, which are in addition to, or more restrictive than the conditions contained in the approval letters shall be incorporated into the plans for the Project.

## **7. Greenhouse Gas Emissions**

No mitigation measures required.

## **8. Hazards and Hazardous Materials**

### **MM-8-1 Emergency Evacuation Plan**

Prior to the issuance of a building permit, the applicant shall develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

## **9. Hydrology and Water Quality**

### **MM-9-1 Surface Drainage**

- All Site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to pond anywhere on the Site, and especially not against any foundation or retaining wall. The Site shall be graded and maintained such that surface drainage is directed away from structures in accordance with 2013 CBC 1804.3 or other applicable standards. In addition, drainage shall not be allowed to flow uncontrolled over any descending slope. Discharges from downspouts, roof drains and scuppers are not recommended onto unprotected soils within five feet of the building perimeter. Planters which are located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support. Landscape irrigation is not recommended within five feet of the building perimeter footings except when enclosed in protected planters.
- Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. Pavement areas shall be fine graded such that water is not allowed to pond.

- Landscaping planters immediately adjacent to paved areas are not recommended due to the potential for surface irrigation or irrigation water to infiltrate the pavement's subgrade and base course. Either a subdrain which collects excess irrigation water and transmits it to drainage structures, or an impervious above-ground planter boxes shall be used. In addition, where landscaping is planned adjacent to the pavement, it is recommended that considerations be given to providing a cutoff wall along the edge of the pavement that extends at least 12 inches below the base material.

## **10. Land Use and Planning**

No mitigation measures required.

## **11. Mineral Resources**

No mitigation measures required.

## **12. Noise**

- MM-12-1** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- MM-12-2** All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance. On-site power generators shall either be plug-in electric or solar powered.
- MM-12-3** All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.
- MM-12-4** Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- MM-12-5** Temporary sound barriers shall be installed as specified:
- A temporary sound barrier no less than 12 feet in height shall be erected to block line-of-sight noise travel from the Project Site's south (alley), west (Granville) and east (Stoner) boundaries to Granville Avenue Residences and Stoner Avenue Residences. This barrier should be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the western, southern, and eastern boundaries of the Project site that face these receptors in order to prevent on-site construction noise from diffracting around its ends.
  - At the Project's northern boundary parallel to Santa Monica Boulevard, temporary noise barriers no less than 7 feet in height shall be erected to prevent Project construction

operations from exceeding LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.

- MM-12-6** When operating at or near surface grade, excavators shall maintain the greatest setback feasible from the Project Site's southern boundary nearest to Granville Avenue Receptors and Stoner Avenue Receptors.

### **13. Population and Housing**

No mitigation measures required.

### **14. Public Services**

**MM-14-1 Public Services (Police – Demolition/Construction Sites)**

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

**MM-14-2 Public Services (Police)**

The plans shall incorporate a design that references the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

- MM-14-3** Upon completion of the Project, the West Los Angeles Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

### **15. Recreation**

No mitigation measures required.

### **16. Transportation/Traffic**

**MM-16-1 Transportation Demand Management Plan**

- The Applicant shall prepare a Transportation Demand Management Plan (TDMP) and Monitoring Program (MP) pursuant to Section 4.G of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) for the development of the project. A fully detailed TDMP and MP shall be prepared by a licensed Traffic Engineer and shall be reviewed and approved by the Department of Transportation (DOT) prior to the issuance of any certificate of occupancy. All subsequent MP reporting should be prepared by a licensed Traffic Engineer and submitted annually to the LADOT West Los Angeles



Planning Office for review and shall begin immediately following the issuance of any certificate of occupancy.

- The TDMP shall comply with the TDM directives of Ordinance No. 168,700 as prescribed in LAMC Section 12.26-J. The TDMP should include, but shall not be limited to, the strategies recommended in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT.
- The MP shall monitor and confirm that the project is achieving a 15 percent trip reduction target. Measurement of actual trips shall be monitored and reported to DOT as outlined in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT. Any review which determines that the mitigation target has not been achieved the project shall be subject to a non-compliance penalty as outlined in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT.

**MM-16-2 Wilshire Boulevard and Westgate Avenue**

- Design and implement the reconfiguration of the northbound intersection operation from a single lane approach to a two (2) lane approach with an exclusive left-turn lane and an exclusive right-turn lane or shared left/right-turn lane.
- Provide traffic signal operation modification and pavement restriping as needed.
- This mitigation measure may be shared with the neighboring development at 11800 Santa Monica Boulevard. In the event that the development at 11800 West Santa Monica Boulevard is not approved or delayed, the applicant for this development shall implement the above mitigation measures.

**MM-16-3 Santa Monica Boulevard and Westgate Avenue**

- Widen the east side of Westgate Avenue along the 11800 Santa Monica Boulevard project frontage, south of Santa Monica Boulevard, by approximately three feet to accommodate the proposed improvements.
- Design and implement the following reconfiguration to the north- and south-bound operations from a single lane approach to a two (2) lane approach with one left-turn lane and one shared through/right-turn lane
- Provide traffic signal operation modification and pavement restriping as needed.
- This mitigation measure may be shared with the neighboring development at 11800 Santa Monica Boulevard. In the event that the development at 11800 West Santa Monica

Boulevard is not approved or delayed, the applicant for this development shall implement the above mitigation measures.

## **17. Tribal Cultural Resources**

### **MM-17-1      Discovery of Tribal Cultural Resources**

Prior to the issuance of a grading permit, applicant or their agent shall retain a professional Native American Monitor to observe ground disturbance activities undertaken on the Project Site. The Native American Monitor shall be selected in consultation with the Gabrieleno Band of Mission Indians–Kizh Nation. Evidence shall be provided to the Department of City Planning that the Native American Monitor has been retained prior to the issuance of a grading permit.

Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity. Monitoring of the Project Site during ground disturbance activities shall comply with the following:

- The applicant, or their agent, shall obtain a professional Native American Monitor, or monitors, by contacting the Gabrieleno Band of Mission Indians – Kizh Nation. Prior to the issuance of a grading permit, evidence shall be provided to the Department of City Planning that monitor(s) have been obtained; A Native American Monitor shall be secured for each grading unit. In the event that there are simultaneous grading units operating at the same time, there shall be one monitor per grading unit;
- In the event that subsurface archaeological resources, human remains, or other tribal cultural resources are encountered during the course of ground disturbance activities work shall cease in the area of the find until the archaeological or other tribal cultural resources are assessed and subsequent recommendations are determined by a qualified archaeologist. The qualified archaeologist shall specify a radius around where resources were encountered to protect such resources until the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 have been fulfilled. Project activities may continue outside of the designated radius area;
- In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, including the required notification to the County Coroner and the Native American Heritage Commission;
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions

taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC).

**18. Utilities and Service Systems**

No mitigation measures required.

**19. Mandatory Findings of Significance**

No mitigation measures required.

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## 2. PROJECT DESCRIPTION

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The section is based in part on the following items, included as Appendix A of this IS/MND:

**A-1**    Plans, Lorcan O’Herlihy Architects, December 2016.

**A-2**    Broker Letter, May 22, 2016.

### Introduction

Project Title:                    Santa Monica/Granville Mixed Use Project

Case Numbers:                ENV-2016-2364-MND

Project Location:            1500 Granville Ave., Los Angeles, CA 90025 (11752, 11760, 11768-11770, and 11776 West Santa Monica Boulevard, 1511-1513 South Stoner Avenue, and 1514 and 1514 ½ South Granville Avenue)

Lead Agency:                City of Los Angeles, Department of City Planning  
200 N. Spring Street, Room 750, Los Angeles, California 90012

City Staff Contact:        May Sirinopwongsagon, City Planner  
(213) 978-1372 and may.sirinopwongsagon@lacity.org

Project Applicant:        S. Santa Monica/E. Granville (LA), Owner, LLC  
4700 Wilshire Boulevard, Los Angeles, California 90010

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed Santa Monica-Granville Project (the Project), which consists of a new mixed-use residential and commercial development.

### CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

#### MITIGATED NEGATIVE DECLARATION

*“Mitigated negative declaration“ means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.*

According to CEQA Guidelines Article 6, Negative Declaration Process:

*15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION*

*A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:*

- (a) 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, or*
- (b) The initial study identifies potentially significant effects, but:*
  - (1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
  - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

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*A Negative Declaration circulated for public review shall include:*

- (a) A brief description of the project, including a commonly used name for the project, if any;*
- (b) The location of the project, preferably shown on a map, and the name of the project proponent;*
- (c) A proposed finding that the project will not have a significant effect on the environment;*
- (d) An attached copy of the Initial Study documenting reasons to support the finding; and*
- (e) Mitigation measures, if any, included in the project to avoid potentially significant effects.*

**Project Location**

The Project Site is located on the south side of Santa Monica Boulevard, between Granville Avenue to the west and Stoner Avenue to the east, in the City of Los Angeles, 90025. The Site is approximately 0.5 mile east of the City of Santa Monica border at Centinela Avenue. See Figure 2-1, Regional Map, for the Site location within the context of the City. See Figure 2-2, Aerial Map, for the Site and surrounding areas.

**Regional Setting**

The Site is approximately 11 miles west of Downtown Los Angeles and approximately 3 miles east of the Pacific Ocean. The Site is located within the West Los Angeles Community Plan (WLA CP), which is located in the western portion of the City of Los Angeles. It is generally bounded by Centinela Avenue on the west, Wilshire Boulevard and Santa Monica Boulevard on the north, National Boulevard, Pico Boulevard, and Exposition Boulevard on the south, and Durango Avenue, Robertson Boulevard, and Canfield Avenue on the east. It is surrounded by the communities of Westwood, Brentwood-Pacific Palisades, Palms - Mar Vista - Del Rey, West Adams-Baldwin Hills-Leimert, and Wilshire; and by the Cities of Culver City, Santa Monica, and Beverly Hills, and the County of Los Angeles. The majority of the WLA CP area consists of low rolling hills and flat plains, and contains approximately 4,565 acres, which is 1.74 percent of the land in the City of Los Angeles. The area surrounding the Project Site includes a mix of multiple-family development, such as apartments and condominiums at varying densities and building types (duplexes, small, medium and large complexes and some high rise structures, especially along Wilshire Boulevard). Public uses include the University High School and West Los Angeles civic and municipal institutions (police station, courthouse, City Hall). Commercial land use consists primarily of strip development on major arterials such as Wilshire, Santa Monica, Pico, Sawtelle, and Westwood Boulevards. The majority of commercial facilities are either small-scale and free standing or mini-mall type buildings designed to primarily serve local neighborhoods.<sup>1</sup>

### ***Regional and Local Access***

Regional access is provided by the San Diego Freeway (I-405) located approximately 0.75 miles east of the Site at Santa Monica Boulevard and Beloit Avenue and the Santa Monica Freeway (I-10) located approximately 1.25 miles south at Pico Boulevard and Bundy Drive. Local access is provided by Santa Monica Boulevard, Wilshire Boulevard, Barrington Avenue, and Bundy Drive.

### ***Public Transit***

The Los Angeles County Metropolitan Transportation Authority (Metro) and Santa Monica Big Blue Bus (BBB) provide bus service to the Site. BBB Line 1 and Metro Line 4 stops at Santa Monica and Westgate. Metro Rapid Line 704 stops at Santa Monica and Barrington approximately 360 feet east of the Site. Additional service includes BBB 14 and Rapid 10 at the intersection of Santa Monica and Bundy, approximately 1,750 feet away. Metro Expo Line light rail operates a station at Exposition Boulevard and Bundy Drive, approximately 4,100 feet south of the Site.

### **Site Characteristics**

The Site's assessor parcel number (APN), zoning, and land use designation are listed on Table 2-1, Project Site. The Site's total area is approximately 58,381 square feet<sup>2</sup> (or 1.34 acres). The Site is in the

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<sup>1</sup> Page 1, West Los Angeles Community Plan: <http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf>

<sup>2</sup> Lorcan O'Herlihy Architects, March 2016.

West Los Angeles Community Plan Area, zoned C2-1VL (Commercial Zone, Height District 1-Very Limited), the General Plan land use designation for the Site is General Commercial, and is within ZI-2442 Preliminary Fault Rupture Study Zone, ZI-2452 Transit Priority Area in the City of Los Angeles, and the Site is within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP).

**Table 2-1**  
**Project Site**

Address	APN	Zone	General Plan Land Use
11776 Santa Monica	4262-006-001	C2-1VL	General Commercial
11770 Santa Monica	4262-006-004		
11768 Santa Monica	4262-006-005		
None			
None	4262-006-030		
11760 Santa Monica			
11752 Santa Monica			
1511, 1513 Stoner	4262-006-008		
1514, 1514½ Granville	4262-006-021		
None			
Source: Zone Information & Map Access System (ZIMAS): <a href="http://zimas.lacity.org">http://zimas.lacity.org</a> , February 2016.			

### Existing Uses

The Project Site contains a collection of structures, most recently utilized as an auto dealership and service center (operated as Buerge Chrysler), with surface parking. The Site consists of several related buildings totaling approximately 24,684 square feet.<sup>3</sup> Implementation of the Project would demolish all existing structure and eliminate all uses. The existing structures will be retained and be reoccupied as a full service auto dealership and repair facility if the Project is not implemented. As set forth in the Lease Interest Letter<sup>4</sup> (see Appendix A-2), local brokers are seeking to lease or purchase the Site for this purpose. The existing Site is shown in Figure 2-3, Views of the Project Site.

### Surrounding Uses

<sup>3</sup> ZIMAS Assessor information, February 2016.

<sup>4</sup> Lease Interest Letter, CBRE, May 22, 2016. Included as Appendix A-2.

The Project Site is rectangular-shaped with commercial uses to the north (across Santa Monica), an under construction residential and retail project (approved under Case Number DIR-2014-2297-DB-SPR and ENV-2014-2298-MND and expected to be finished in summer 2017) to the west (across Granville), multi-family residential to the south (across an alleyway), and a Goodwill donation store and surface parking to the east (across Stoner). The nearest sensitive receptors would be the existing residential uses approximately 25 feet to the south of the Site, separated by an alley. The surrounding uses are shown in Figure 2-4, Views of the Surrounding Uses.

### **Proposed Project**

The Project would be a development with approximately 154 residential units and approximately 6,011 square feet of restaurant and 9,106 square feet of retail. The building would be situated on two levels of subterranean parking; a ground level with parking, restaurant, retail, and live/work units; and 4 upper residential levels situated around courtyards/pool deck. Building plans for each level, elevations, and a viewpoint rendering from the street are included in Appendix A-1.

#### ***Residential***

The 154 residential units are anticipated to include 30 studio units, 59 one-bedroom units, 60 two-bedroom units, 1 three-bedroom units, and 4 live/work units.<sup>5</sup> The unit mix may change.

#### ***Commercial***

The 6,011 square feet of restaurant (consisting of 3,850 square feet of quality restaurant and 2,161 square feet of high turnover restaurant) and 9,106 square feet of retail spaces (consisting of 7,043 square feet of other retail<sup>6</sup> and 2,063 square feet of specialty retail<sup>7</sup>)<sup>8</sup> would be located along Santa Monica Boulevard.

#### ***Floor Area***

The development would be approximately 175,140 square feet of Floor Area<sup>9</sup>, with a Floor-Area-Ratio

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<sup>5</sup> Lorcan O'Herlihy Architects, December 2016.

<sup>6</sup> The West LA TIMP defines Other Retail as "low trip generators such as jewelry shops, art supply stores, quality apparel stores, etc."

<sup>7</sup> The West LA TIMP defines Specialty Retail as "high trip generators such as yogurt and specialty coffee shops, video rentals, dry cleaning, etc."

<sup>8</sup> Traffic Update Memo, December 21, 2016.

<sup>9</sup> Floor Area is defined as "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



(FAR) of 3.0:1.<sup>10</sup>

### Height

The height would be approximately 56 feet to the top of the roof.

### Open Space

Table 2-2, Open Space, provides the amount of open space that is required and amount provided.

**Table 2-2  
Open Space**

Amount Required						
Use	Amount (units)			Rate	Total	
Units < 3 habitable rooms	34			100 sf / unit	3,400	
Units = 3 habitable rooms	59			125 sf / unit	7,375	
Units > 3 habitable rooms	61			175 sf / unit	10,675	
Total Required					21,450	
Amount Provided						
Level	1	2	3	4	5	Total
West Patio	864					864
East Patio	498					498
Commercial Plaza	1,510					1,510
West Court		4,244				4,244
East Court		2,881				2,881
Pool		4,542				4,542
Recreation – Fitness		971				971
Recreation - Clubhouse		1,160				1,160
Recreation – Screening Room		828				828
Terrace					500	500
Private Open Space (19% of total)						4,350
Total Provided					22,348	

*In square feet.*

*Source: Lorcan O’Herlihy Architects, December 2016.*

*parking, space for the landing and storage of helicopters, and Basement storage areas.” Los Angeles Municipal Code Section 12.03.*

<sup>10</sup> FAR is 175,140 / 58,381 = 3.0.

### Access

Vehicle access would be provided by a driveway from Stoner Avenue. Vehicles would enter and exit by one driveway and access the parking ramp along the east side of the Project Site. A loading area would be at ground level near the parking ramp to the lower levels. Pedestrian access would be provided on Santa Monica Boulevard, Stoner Avenue, and Granville Avenue.

### Parking

Table 2-3, Vehicle Parking, provides the amount of required parking by land use type and quantity. The Project is required to have 311 spaces. The Project will provide parking to satisfy Code requirements.

**Table 2-3**  
**Vehicle Parking**

Amount Required			
Use	Amount (size)	Rate	Total spaces
Restaurant	6,011 sf	10 / 1,000 sf	60
Retail	9,106 sf	4 / 1,000 sf	36
<b>Subtotal Commercial</b>			<b>96</b>
Live/Work	4 units	1 / unit	4
Studio	30 units	1 / unit	30
1-Bedroom	59 units	1 / unit	59
2-bedroom	60 units	2 / unit	120
3-Bedroom	1 units	2 / unit	2
<b>Subtotal Residential</b>			<b>215</b>
<b>Total Required</b>			<b>311</b>
<i>Source: Lorcan O'Herlihy Architects, December 2016.            Per LAMC Section 12.21.A.4(k) spaces up to and including ½ (0.5) can be disregarded.            Table by CAJA Environmental Services, January 2017.</i>			

### Bicycles

Los Angeles Municipal Code (LAMC) 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses require one short term and one long term bicycle space per 2,000 square feet of floor area. Residential uses require that long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest room and short-term bicycle parking shall be provided at a rate of one per ten dwelling units or guest rooms. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As shown in Table 2-4, Bicycle Parking Required, the Project will provide, at a minimum, 24 short term and 162 long term bicycle spaces.

**Table 2-4  
Bicycle Parking Required**

Use	Amount	Rate	Short-Term	Long-Term
Retail	15,117 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	8	8
Residential	154 units	1 per 10 units (short-term) 1 per 1 unit (long-term)	16	154
<b>Total</b>			<b>24</b>	<b>162</b>
<i>Source: Los Angeles Municipal Code (LAMC) 12.21 A.16(a)(2)  Per LAMC Section 12.21.A.4(b) spaces up to and including ½ (0.5) can be disregarded.  Table by CAJA Environmental Services, January 2017.</i>				

### **Landscaping**

The Site currently has no trees; however, there are five street trees on the City sidewalk on the north side along Santa Monica Boulevard. These are off-site street tree as part of the City's planting program and not a native originating (natural to the location) trees. If the Project removes street trees, they will be replaced according to the City's regulatory tree removal and replacement program. There will be landscaping around the Site at the ground floor, in the courtyards, and in the terrace.

### **Green/Conservation Features**

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).<sup>11</sup>

### **Construction Information**

The estimated construction schedule is shown in Table 2-5, Construction Schedule. Operation could begin in 2019.<sup>12</sup> Demolition will remove approximately 24,684 square feet of existing buildings, and associated surfacing parking area. The amount of soils removed would be approximately 49,220 cubic yards (cy).<sup>13</sup> The Project will contain two subterranean levels.

It is anticipated that the exported dirt will be transported to Sunset Valley Farms (3678 Sunset Valley in Moorpark).<sup>14</sup> The estimated haul route is approximately 42 miles and will generally include: Santa Monica Boulevard to I-405 freeway to US-101 freeway to SR-23 North to Tierra Rejada Road.

<sup>11</sup> Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>

<sup>12</sup> Page 1, Traffic Study Memorandum of Understanding, Overland Traffic, March 2016.

<sup>13</sup> Client provided information, March 2016.

<sup>14</sup> Client provided information, March 2016.

**Table 2-5  
Construction Schedule**

<b>Phase</b>	<b>Duration</b>	<b>Start</b>	<b>End</b>
Demolition	6 weeks	Jan 2, 2017	Feb 13, 2017
Site Prep	2 weeks	Feb 13, 2017	Feb 27, 2017
Grading and Excavation	2 months	Feb 27, 2017	April 24, 2017
Core/shell Construction	18.5 months	Feb 27, 2017	Sept 3, 2018
Finishing and Tenant Improvements	2 months	March 5, 2018	May 7, 2018
<i>Construction schedule, including start, end, and duration dates are estimates only.  Client provided information, March 2016.  Table: CAJA Environmental Services, March 2016.</i>			

### **Project Objectives**

The objectives of the Project are as follows:

- Capitalize on smart growth opportunity on a site by intensifying a currently under-utilized single-use site with a mix of residential and retail uses.
- Provide residential uses nearby the retail and office uses along Santa Monica Boulevard.
- Activate the stretch of Santa Monica Boulevard with new contemporary retail opportunities that could serve the dense residential communities to the south and north.
- Provide density along a transit corridor served by Metro and Santa Monica BBB lines and within 0.75 mile of the Metro Expo Line light rail Expo/Bundy Station.
- Improve the aesthetic quality and sustainability of the Site by removing older, out-dated buildings and parking lot and developing a modern, efficient building that utilizes the latest City and State Green Building Codes.
- Contribute to the economic recovery of the City by developing ground floor retail use that generate local tax revenues, provide new jobs, with employees who support local businesses, including dining, shopping and entertainment venues nearby.
- Create an architecturally-inspired development that is economically sustainable, compatible with surrounding land uses, and consistent with the policies and objectives of the West Los Angeles Community Plan.

### **Discretionary Actions**

The Project will require approval of the following discretionary actions:<sup>15</sup>

1. On-menu incentive for a Floor Area Ratio of 3.0:1 in lieu of the 1.5:1 otherwise permitted in the C2-1VL zone as permitted by LAMC Section 12.22.A.25(f)(4)(ii);
2. Off-menu incentive to allow a height of 5 stories and 56 feet in lieu of the 3 stories and 45 feet otherwise permitted in the C2-1VL zone for a mixed use project as permitted by LAMC Section 12.22.A.25.G(3);
3. Pursuant to Section 16.05, Site Plan Review to allow a development consisting of 15,117 square feet of retail and 154 dwelling units;
4. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, and building permits.

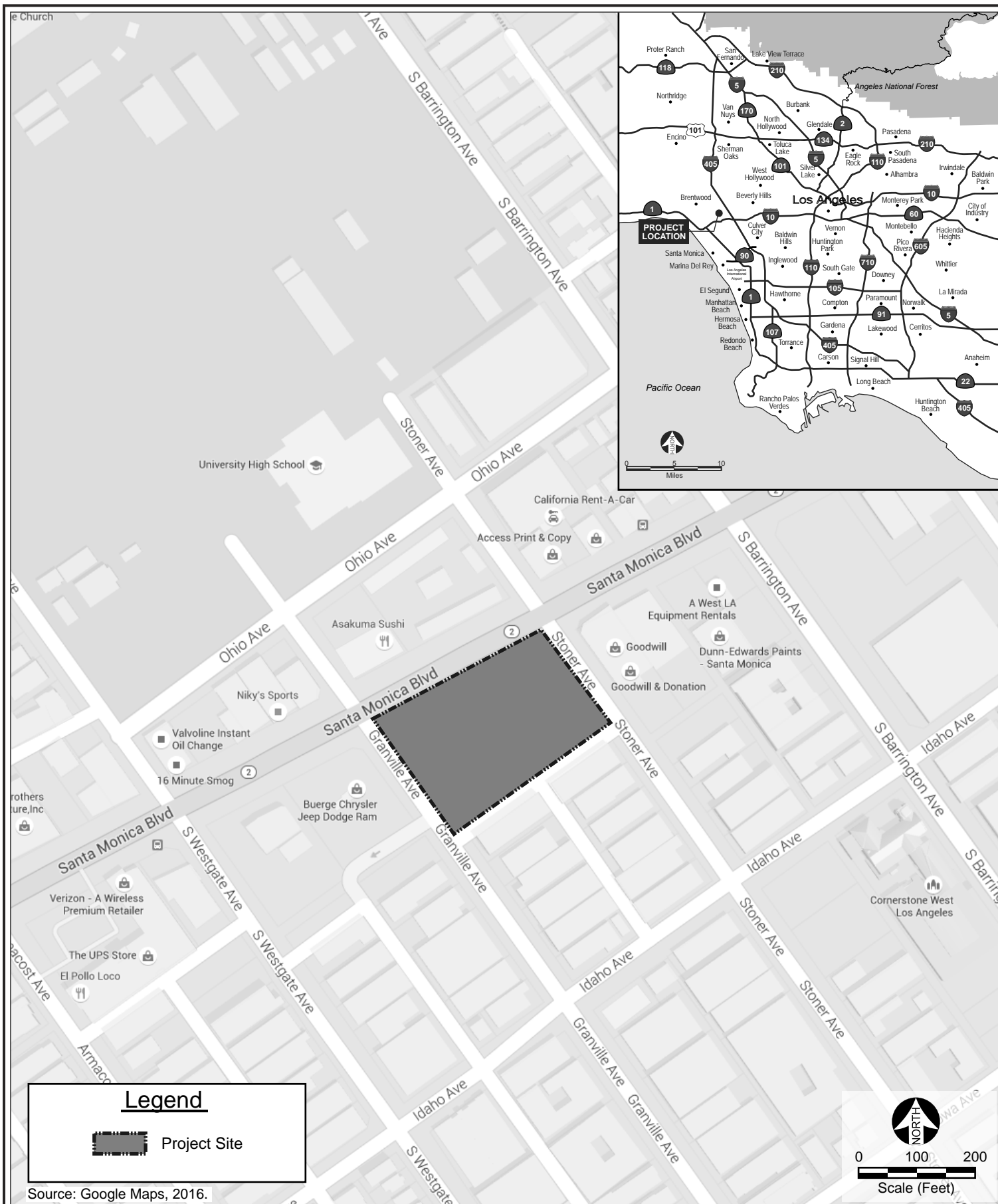
### **Ministerial Request**

Approximately 29 % Density Bonus as permitted by LAMC Section 12.22 A 25(c)(1) and Parking Option 1 as permitted by LAMC Section 12.22 A 25(d)(1).

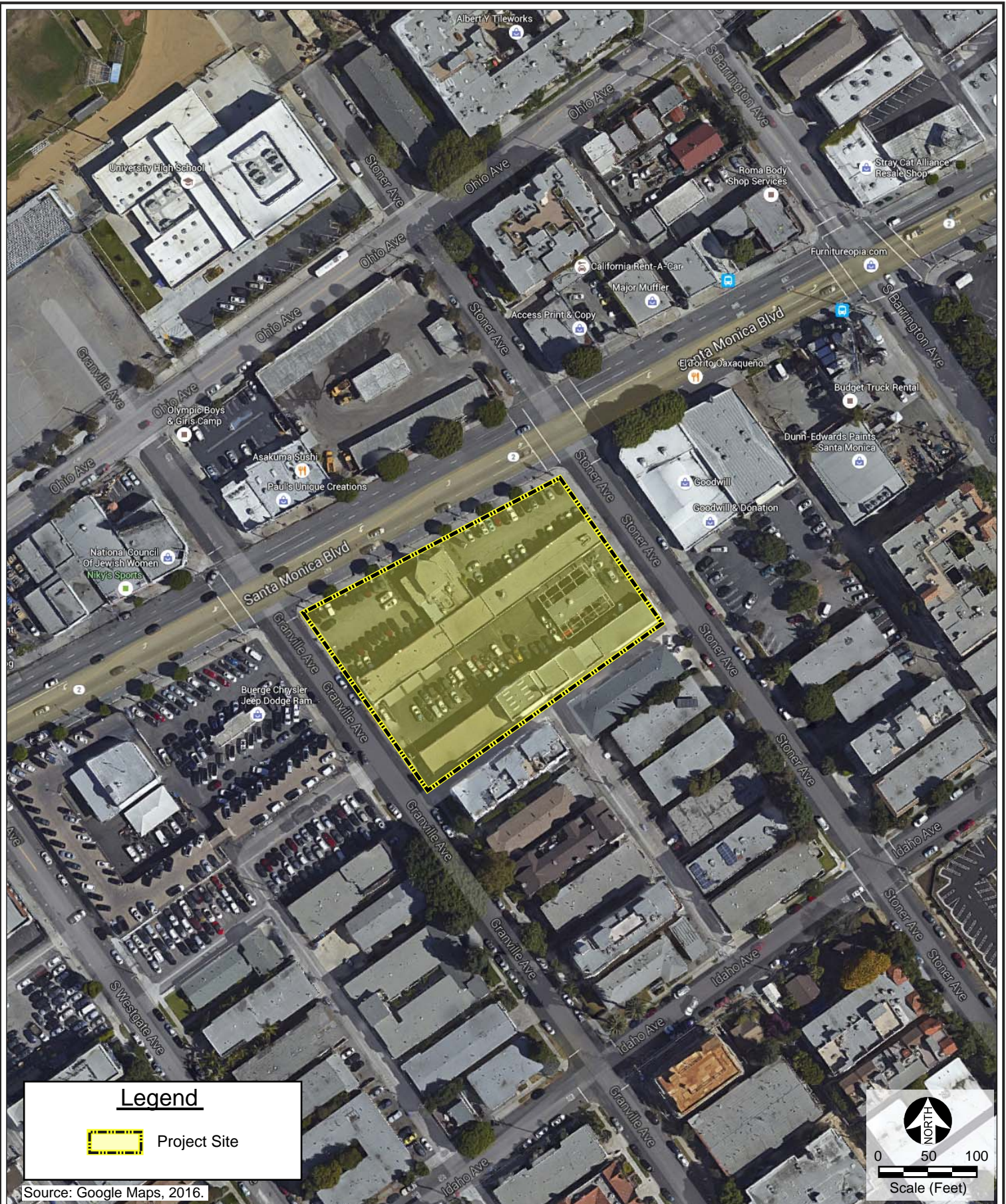
Pursuant to various sections of the Los Angeles Municipal Code, the applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements. This MND is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This MND also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above.

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<sup>15</sup> Michael Gonzales, Project representation, June 2016.











**View 1:** View west from Stoner of existing buildings on the Project Site.



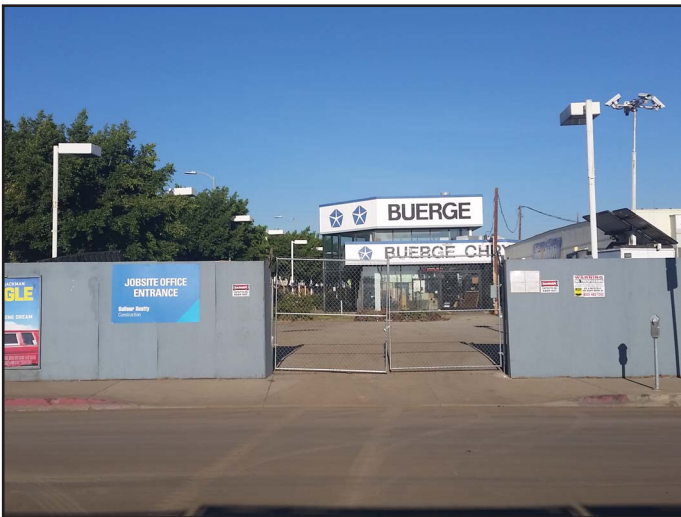
**View 2:** View east from Granville of existing buildings on the Project Site.



**View 3:** View east of rear alley on the Project Site.

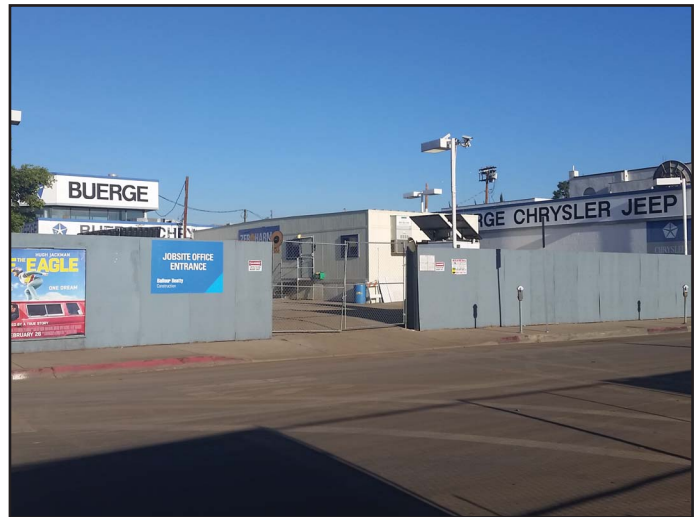


**View 4:** View east across Granville toward existing buildings on the Project Site.



**View 5:** View east across Granville toward existing buildings on the Project Site.

Source: CAJA Environmental Services LLC, 2016.



**View 6:** View east across Granville toward existing buildings on the Project Site.





**View 1:** View east across Stoner toward surrounding commercial use.



**View 2:** View east across Stoner toward surrounding residential uses.



**View 3:** View north across Santa Monica toward surrounding commercial uses.



**View 4:** View west across Granville toward surrounding under construction uses.



**View 5:** View east across Granville toward surrounding residential uses.



**View 6:** View west across rear alley toward surrounding residential uses.

Source: CAJA Environmental Services LLC, 2016.

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### 3. ENVIRONMENTAL IMPACT ANALYSIS

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#### 1. AESTHETICS

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the L.A. CEQA Thresholds Guide.

The City of Los Angeles issued ZI-2452 (Transit Priority Areas (TAs) / Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA) confirming that SB 743 applies to a project’s aesthetic impacts, including shade and shadow impacts. Visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA. The Site is within a TPA.

The Project is a mixed-use infill development, including 154 dwelling units and approximately 9,106 square feet of retail and approximately 6,011 square feet of restaurant use. The Site is located within a transit priority area. The intersection of Santa Monica Boulevard and Bundy Drive is 2,250 feet away (within the ½ mile) and includes Metro 4, Rapid 704 and Big Blue Bus (BBB) lines 1, 14, Rapid 10. BBB 1<sup>1</sup> runs along Santa Monica Boulevard and has a frequency of every 10-12 minutes and Rapid 704<sup>2</sup> runs along Santa Monica Boulevard and has a frequency of every 10-15 minutes during AM and PM commute times (whereas the requirement is 15 minutes). Further, the Project site is located in an urban area on a lot currently developed with auto dealership uses and surface parking. Thus, the Project’s aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to Public Resources

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<sup>1</sup> <http://www.bigbluebus.com/Routes-and-Schedules/Route-1.aspx>

<sup>2</sup> [https://d1akjheu06qp1r.cloudfront.net/riding\\_metro/bus\\_overview/images/704.pdf](https://d1akjheu06qp1r.cloudfront.net/riding_metro/bus_overview/images/704.pdf)

Code Section 21099. Therefore, an assessment of the Project's potential aesthetics impacts is not required. However, the analysis is included for full disclosure.

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

**Less Than Significant Impact.** A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Site is located in the West Los Angeles Community Plan (WLA CP) in the City of Los Angeles (City), approximately 11 miles west of Downtown Los Angeles and approximately 3 miles east of the Pacific Ocean. The majority of the WLA CP consists of low rolling hills and flat plains. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site, structures on adjacent parcels, and the area's relatively flat topography. Due to the existing built environment, there are no views of the nearby Santa Monica Mountains, the Pacific Ocean, or any significant or historic building. There are no remarkable views, or scenic vistas to the east, west, or south.

In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.<sup>3</sup> Urban features that may contribute to an area's valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.<sup>4</sup>

There are no tall or topographic features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community. At the street level, views in all directions are largely constrained by structures on adjacent parcels. Views south along Granville Avenue are limited by existing trees and the Stoner Recreation Center. There are no views toward Olympic Boulevard. Views east along Santa Monica Boulevard include the tall office buildings on Santa Monica and Sepulveda. Views west along Santa Monica Boulevard include the immediate commercial buildings in the area. Views north include the tall office buildings on Wilshire Boulevard and Barrington Avenue. These views are available from the public sidewalks and would not be impeded by the Project.

The proposed 5-story building would be comparable to other structures in the area, and thus will not introduce an incompatible scenic element into the community. There are several under construction 4-

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<sup>3</sup> *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

<sup>4</sup> *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

story apartment buildings on 1515 Westgate Avenue and on 1519 Granville Avenue to the west of the Site; there is an entitled 4-story building across Granville Avenue to the Site at 11800 Santa Monica Boulevard; a 3-story commercial buildings on Santa Monica Boulevard; a 5-story residential building on Santa Monica and Federal Avenue, and several 4 and 5 story residential buildings on Westgate Avenue and Idaho Avenue. The surrounding uses are shown in Figure 2-4, Views of the Surrounding Uses. There are currently one- and two-story buildings on the Project Site. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. As per ZI No. 2452 and SB 743, aesthetic impacts “shall not be considered significant impacts on the environment.” Therefore, impacts will be less than significant.

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

**Less Than Significant Impact.** A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as trees, rock outcroppings or historic buildings located on-site. There are no Historic Preservation Overlay Zones (HPOZs) in the area.<sup>5</sup> There are no Los Angeles Historic-Cultural Monuments (HCMs) immediately adjacent to the Site. The nearest are:<sup>6</sup>

- 1638 Stoner Avenue is a single family residence representative of bungalow style, approximately 750 feet south of the Site;
- 1606 Barrington Avenue is a religious building, approximately 550 feet southeast of the Site.
- LA-696 (Jones and Emmons Building) at 12248 Santa Monica Boulevard, approximately 2,350 feet west of the Site;
- SM-522 (Serra Springs), at 11800 Texas Avenue, approximately 1,400 feet north of the Site.<sup>7</sup>

None is directly visible from the Site due to distances and intervening buildings such as the University High School complex. There are no major open spaces and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the Project Site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway.<sup>8</sup> Santa

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<sup>5</sup> <http://preservation.lacity.org/hpoz/la>

<sup>6</sup> *Historic Places LA:* <http://www.historicplacesla.org/map>

<sup>7</sup> <http://cityplanning.lacity.org/complan/HCM/HCM.CFM>

<sup>8</sup> *California Scenic Highway Mapping Systems:* [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm)

Monica is designated a scenic highway from Sepulveda to the City of Beverly Hills boundary.<sup>9</sup> It is not a scenic highway near the Project Site.

There are five street trees on the City sidewalk along Santa Monica Boulevard. These are off-site street tree as part of the City's planting program and not a native originating (natural to the location) trees. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts to scenic resources will be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

The Project will create a mixed-use development (retail ground floor and residential dwelling units above) on Santa Monica Boulevard. The Project does not result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area. The removal of an underutilized auto dealership service use that lacks any street and pedestrian activation would not degrade the existing visual character.

The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is surrounded by an eclectic mix of urban land uses. Santa Monica Boulevard includes multi-family housing, retail, office, recreation, and institutional (schools and services) uses. There are commercial uses to the north (across Santa Monica), commercial uses to the east (across Stoner), multi-family residential to the south (across an alleyway), and an entitled residential and retail building under construction to the west (across Granville). The area surrounding the Project Site includes a mix of multiple-family development, such as apartments and condominiums at varying densities and building types (duplexes, small, medium and large complexes and some high rise structures). Public uses include the University High School and West Los Angeles civic and municipal institutions (police station, courthouse, City Hall). Commercial land uses consists primarily of strip development on major arterials such as Wilshire, Santa Monica, Pico, Sawtelle, and Westwood Boulevards. The majority of commercial facilities are either small-scale and free standing or mini-mall type buildings designed to primarily serve local neighborhoods.<sup>10</sup>

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of developments, and size. The

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<sup>9</sup> *Mobility Element 2035*: <http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF>

<sup>10</sup> *Page 1, West Los Angeles Community Plan*: <http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf>

building would be primarily viewed from its Santa Monica Boulevard frontage. The first floor would contain the retail spaces with residential uses and balconies on the upper levels. There would be a driveway on Stoner Avenue. Pedestrian entrances would be locating along Santa Monica Boulevard, Stoner Avenue, and Granville Avenue.

The building design makes a clear distinction between the ground floor commercial and the upper level residential uses with a transition element of color accents and architectural elements such as smaller windows and balconies. The retail will include large glass windows and minimal solid walls. The residential uses will have smaller and more numerous windows and additional solid walls to ensure privacy. Various projections in the façade will break up large expanses of walls. Retail identifying signage will be mounted at the top of the ground floor level on the primary frontages but will not interfere with the residential component. While the two uses (commercial and residential) are distinctly different from a programmatic and user/pedestrian aesthetic, the building is unified through the use of complimentary colors and materials to create a design synergy along the entire frontage. The Project supports walkability with ground floor retail on Santa Monica Boulevard. Therefore, the Project would not degrade the existing visual character or quality of the Site and its surroundings and impacts would be less than significant.

There will be landscaping around the Site at the ground floor, in a central courtyard, and on the rooftop pool area. The Project would be landscaped according to LAMC Section 12.40 and 12.41. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. The Project shall comply with the following provisions of the Los Angeles Municipal Code (LAMC):

### ***Regulatory Compliance Measures***

#### **RCM-1-1      Vandalism**

The project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Los Angeles Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Los Angeles Municipal Code Section 91.8104.15.

#### **RCM-1-2      Signage on Construction Barriers**



The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

**RCM-1-3      Aesthetics (Landscape Plan)**

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

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

**Less Than Significant Impact.** A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area is highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling on streets in the vicinity of the Project Site. As per ZI No. 2452 and SB 743, aesthetic impacts “shall not be considered significant impacts on the environment.”

**Light**

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic on Santa Monica Boulevard and surrounding side streets also contribute to overall ambient lighting levels. The Project would create additional sources of

illumination. The Project Site currently contains a former auto dealership that, until recently, had active night lighting for vehicle illumination, signage, and security lights. The Project would contain a 5-story building with ground floor commercial and upper levels of residential units. Windows and the amount of interior lighting coming through windows would increase when compared to current conditions. The Project will provide exterior illumination at street level for security and pedestrian activity. All exterior lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized area that is already illuminated at night, and the Project’s lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. Impacts would be less than significant.

### **Glare**

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. Building surfaces or glass windows have the potential to create glare, particularly during the early morning and later afternoon time periods. The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating. Impacts would be less than significant.

### **Shade/Shadow**

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. “Solstice” is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter



solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

### ***Screening Criteria and Thresholds of Significance<sup>11</sup>***

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.
- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

The Project's structure will not exceed a height of 58 feet above the ground elevation. Per the screening criteria of the City CEQA Thresholds Guide, the Project does not include structures in excess of 60 feet in height above the ground elevation. In addition, there are no sensitive uses in the arc of shadows (northwest, north, and northeast of the Site). Uses in the arc include the public right of ways of Granville, Santa Monica, and Stoner and enclosed commercial uses along the north side of Santa Monica. There are no routinely useable outdoor spaces. Therefore, there would be no impact to shadow-sensitive uses because the Project's structure does not exceed the City's screening criteria for potential shade and

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<sup>11</sup> L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.

shadow impacts. As per ZI No. 2452 and SB 743, aesthetic impacts “shall not be considered significant impacts on the environment.” No impact would occur.

## **2. AGRICULTURE AND FORESTRY RESOURCES**

- a) Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?**

**No Impact.** A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project Site is zoned C2-1VL (Commercial Zone, Height District 1-Very Limited) and the General Plan land use designation for the Site is General Commercial. The Site contains a former auto dealership and is completely paved. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.<sup>12</sup> Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

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

**No Impact.** A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.<sup>13</sup> The Project Site is not zoned for agricultural use and is not subject to a Williamson Act Contract. The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

- 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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<sup>12</sup> State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, December 8, 2016.

<sup>13</sup> State of California Department of Conservation, Williamson Act Program, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, December 8, 2016.

**No Impact.** Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland will occur.

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

**No Impact.** The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

- 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.** A significant impact may occur if a project involves other changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is completely surrounded by urban uses and infrastructure. Neither the Project Site nor the surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

### 3. AIR QUALITY

The section is based in part on the following item, included as Appendix B of this IS/MND:

**B** Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, May 2016.

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

**Less Than Significant Impact.** In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the Basin), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2012 AQMP on December 7, 2012.<sup>14</sup> The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures through educational programs or fines, when necessary.

#### **Pollutants and Effects**

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O<sub>3</sub>), nitrogen monoxide and dioxide (NO and NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>), particulate matter ten microns or less in diameter (PM<sub>10</sub>), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric

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<sup>14</sup> SCAQMD, AQMP: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>

conditions, a typical situation at dusk in urban areas between November and February.<sup>15</sup> The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O<sub>3</sub>) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>) react in the presence of ultraviolet sunlight. O<sub>3</sub> is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO<sub>x</sub>, the components of O<sub>3</sub>, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O<sub>3</sub> formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O<sub>3</sub> at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Nitrogen Monoxide and Dioxide (NO and NO<sub>2</sub>) like O<sub>3</sub>, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO<sub>2</sub> are collectively referred to as NO<sub>x</sub> and are major contributors to O<sub>3</sub> formation. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. High concentrations of NO<sub>2</sub> can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO<sub>2</sub> and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO<sub>2</sub>) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO<sub>2</sub> are coal and oil used in power plants and industries. Generally, the highest levels of SO<sub>2</sub> are found near large industrial complexes. In recent years, SO<sub>2</sub> concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO<sub>2</sub> and limits on the sulfur content of fuels. SO<sub>2</sub> is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO<sub>2</sub> can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM<sub>2.5</sub>, is

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<sup>15</sup> *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM<sub>2.5</sub> can be formed in the atmosphere from gases such as SO<sub>2</sub>, NO<sub>x</sub>, and VOC. Inhalable particulate matter, or PM<sub>10</sub>, is about 1/7 the thickness of a human hair. Major sources of PM<sub>10</sub> include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

- PM<sub>2.5</sub> and PM<sub>10</sub> pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM<sub>2.5</sub> and PM<sub>10</sub> can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM<sub>10</sub> tends to collect in the upper portion of the respiratory system, PM<sub>2.5</sub> is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.
- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

## **Regulatory Setting**

### ***Federal***

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by CARB. As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table 3.3-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O<sub>3</sub> and PM<sub>2.5</sub>, attainment for PM<sub>10</sub>, maintenance for CO, and attainment/unclassified for NO<sub>2</sub>.

### ***State***

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 3.3-1. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.



**Table 3.3-1**  
**State and National Ambient Air Quality Standards and Attainment Status**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O <sub>3</sub> )	1-hour	0.09 ppm (180 µg/m <sup>3</sup> )	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m <sup>3</sup> )	/a/	0.075 ppm (147 µg/m <sup>3</sup> )	Nonattainment
Respirable Particulate Matter (PM <sub>10</sub> )	24-hour	50 µg/m <sup>3</sup>	Nonattainment	150 µg/m <sup>3</sup>	Nonattainment
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	Nonattainment	--	--
Fine Particulate Matter (PM <sub>2.5</sub> )	24-hour	--	--	35 µg/m <sup>3</sup>	Nonattainment
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Nonattainment	12 µg/m <sup>3</sup>	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m <sup>3</sup> )	Attainment	9 ppm (10 mg/m <sup>3</sup> )	Maintenance
	1-hour	20 ppm (23 mg/m <sup>3</sup> )	Attainment	35 ppm (40 mg/m <sup>3</sup> )	Maintenance
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	Nonattainment	53 ppb (100 µg/m <sup>3</sup> )	Maintenance
	1-hour	0.18 ppm (338 µg/m <sup>3</sup> )	Nonattainment	100 ppb (188 µg/m <sup>3</sup> )	Maintenance
Sulfur Dioxide (SO <sub>2</sub> )	24-hour	0.04 ppm (105 µg/m <sup>3</sup> )	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m <sup>3</sup> )	Attainment	75 ppb (196 µg/m <sup>3</sup> )	Attainment
Lead (Pb)	30-day average	1.5 µg/m <sup>3</sup>	Nonattainment	--	--
	Calendar Quarter	--	--	0.15 µg/m <sup>3</sup>	Attainment

/a/ CARB has not determined 8-hour O<sub>3</sub> attainment status.

Source: CARB, Ambient Air Quality Standards, and attainment status, accessed April 17, 2016 ([www.arb.ca.gov/desig/adm/adm.htm](http://www.arb.ca.gov/desig/adm/adm.htm))

### **Local**

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts creating the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for

establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM<sub>2.5</sub> strategy standard.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals. In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it didn't set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

### **Air Pollution Climatology**

The Project site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO<sub>2</sub> react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains. Air quality problems also occur during the fall and winter, when CO and NO<sub>2</sub> emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO<sub>2</sub> concentrations are also generally higher during fall and winter days.

### ***Air Monitoring Data***

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 3.3-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. The one-hour State standard for O<sub>3</sub> was exceeded one time during this three-year period while the daily federal standard was exceeded once. CO and NO<sub>2</sub> levels did not exceed the CAAQS from 2012 to 2014.

**Table 3.3-2  
2012-2014 Ambient Air Quality Data In Project Vicinity**

Pollutant	Pollutant Concentration & Standards	Northwest Coastal LA		
		2012	2013	2014
Ozone	Maximum 1-hour Concentration (ppm)	0.093	0.088	0.116
	Days > 0.09 ppm (State 1-hour standard)	0	0	1
	Days > 0.075 ppm (Federal 8-hour standard)	0	0	4
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	N/A	2.0
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	0
	Maximum 8-hour Concentration (ppm)	1.4	1.3	1.3
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0613	0.0512	0.0639
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM <sub>10</sub>	Maximum 24-hour Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Days > 50 µg/m <sup>3</sup> (State 24-hour standard)	N/A	N/A	N/A
PM <sub>2.5</sub>	Maximum 24-hour Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Days > 35 µg/m <sup>3</sup> (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A

	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Source: SCAQMD annual monitoring data ( <a href="http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year">www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year</a> ) accessed April 29, 2016. N/A: Not available at this monitoring station.				

### **Toxic Air Pollution**

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

### **Thresholds of Significance**

For the purposes of this analysis, air quality impacts of the Project would be considered significant if they would exceed the following Standards of Significance, which are based on Appendix G of the *2013 State CEQA Guidelines*. According to these guidelines, a project would normally have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan.

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people.

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook*, *Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

### Existing Emissions

The Project site includes 24,684 square feet of a former auto dealership and service center with surface parking. As shown in Table 3.3-3, the majority of emissions are generated from mobile sources that access the commercial uses at the Project Site.

**Table 3.3-3**  
**Estimated Daily Operations Emissions - Unmitigated**

Emission Source	Pounds Per day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	2	4	16	<1	2	1
<b>Total Operations</b>	<b>3</b>	<b>4</b>	<b>16</b>	<b>&lt;1</b>	<b>2</b>	<b>1</b>
<i>Source: DKA Planning 2016 based on CalEEMod 2013.2.2 model runs.</i>						

### Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. ARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. There are several existing or reasonably foreseeable sensitive receptors near the Project Site, including:

- 1525 South Granville Avenue, a multi-family residential building approximately 80 feet west of the project site, at approximately the same elevation.
- 1527 South Granville Avenue, a multi-family residential building approximately 70 feet south of the site, at approximately the same elevation.
- 1524 South Granville Avenue, a multi-family residential building approximately 150 feet south of the site, at approximately the same elevation.
- 11852 Santa Monica Boulevard, proposed multi-family residential building approximately 120 feet west of the site, at approximately the same elevation.
- University High School, a public high school with outdoor playgrounds approximately 295 feet north of the site, at approximately the same elevation.
- 11800 Santa Monica Boulevard, proposed multi-family residential and retail building approximately 60 feet west of the site, at approximately the same elevation.

### **Consistency with Air Quality Plans**

#### ***SCAQMD Air Quality Management Plan***

The proposed residential land use will neither conflict with the SCAQMD's 2012 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2012 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The 2016 RTP/SCS, adopted in April 2016, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the West Los Angeles Community Plan area that implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's growth capacity for the West Los Angeles Community Plan, which accommodated a projected population of 83,331 and housing base of 42,877 units by 2010.<sup>16</sup> No further projections beyond 2010 have been prepared by the City.

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<sup>16</sup> West Los Angeles Community Plan, [www.cityplanning.lacity.org/complan/pdf/wlacpTxt.pdf](http://www.cityplanning.lacity.org/complan/pdf/wlacpTxt.pdf). 1999.

The Project would develop 154 residential units and 15,117 square feet of restaurants and retail in the City of Los Angeles. The Project could add 433<sup>17</sup> residents to the Plan area, based on the City's projected household density. This would marginally increase population in the South Coast Air Basin. This is a conservative projection, because all the added residents may not be new to the South Coast Air Basin or the City as they may be relocating from other parts of the South Coast Air Basin or the City. While the Project site is designated as "General Commercial" in the Community Plan, this zoning classification allows residential uses by right. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

**Table 3.3-4**  
**Project Consistency With Air Quality Management Plan's Growth Forecast**

Forecast Year	City Population	Project	City Households	Project
2020	3,991,700	433	1,455,700	154
2035	4,320,600		1,626,600	
Source: DKA Planning 2016 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.81 persons per household per 2010 Census. Employment forecast based on SCAG “Employment Density Study”, October 31, 2001.				

### ***City of Los Angeles General Plan Air Quality Element***

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in Table 3.3-5, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be considered less than significant.

The air quality impacts of residential development on the Project site are accommodated in the region's emissions inventory for the 2012 and 2016 RTP/SCS and 2012 AQMP. The Project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be considered less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and would not conflict with its six goals and 15 objectives.

**Table 3.3-5**  
**General Plan Air Quality Element**

Policy	Analysis
<b>Policy 1.3.1</b> Minimize particulate emissions from	<b>Consistent.</b> Construction activities will comply with

<sup>17</sup> The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf>.

**Table 3.3-5  
General Plan Air Quality Element**

<b>Policy</b>	<b>Analysis</b>
construction sites.	SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM <sub>10</sub> and PM <sub>2.5</sub> .
<b>Policy 1.3.2</b> Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	<b>Consistent.</b> There will be no unpaved roads or parking lots. All areas will be paved and developed.
<b>Policy 2.1.1.</b> Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	<b>Consistent.</b> The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by Metro and the Santa Monica Big Blue Bus. See Metro Routes 4 and 704 on Santa Monica Boulevard, Routes 20 and 720 on Wilshire Boulevard, and Santa Monica Big Blue Bus Routes 1 and 2 on Santa Monica and Wilshire Boulevards, respectively. The Metro Expo Line opened in May 2016 and has a station south of the Site at Bundy and Exposition.
<b>Policy 2.1.2.</b> Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	<b>Consistent.</b> Where appropriate, the Project could include tenants that encourage telecommuting in the future.
<b>Policy 2.2.1.</b> Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	<b>Consistent.</b> Where appropriate, the property management company could encourage future tenants to promote rideshare programs and subsidies. The project would have WiFi available for guests that would encourage telecommuting.
<b>Policy 2.2.2.</b> Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	<b>Consistent.</b> Where appropriate, the Project could institute parking management practices in the future.
<b>Policy 2.2.3.</b> Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	<b>Not Applicable.</b> The Project does not include special events that would require traffic management.
<b>Policy 3.2.1.</b> Manage traffic congestion during peak hours.	<b>Consistent.</b> The Project would minimize traffic impacts below significance thresholds with mitigation measures described in the traffic section of this IS/MND including a TDM plan and physical intersection improvements.
<b>Policy 4.1.1.</b> Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	<b>Consistent.</b> The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
<b>Policy 4.1.2.</b> Ensure that project level review and approval of land use development remains at the local level.	<b>Consistent.</b> The Project would be entitled and environmentally cleared at the local level.
<b>Policy 4.2.1.</b> Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form	<b>Not Applicable.</b> This policy calls for City updates to its



**Table 3.3-5  
General Plan Air Quality Element**

<b>Policy</b>	<b>Analysis</b>
and to promote more transit-oriented development and mixed-use development.	General Plan.
<b>Policy 4.2.2</b> Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	<b>Consistent.</b> The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
<b>Policy 4.2.3</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	<b>Consistent.</b> The Project includes pedestrian activity on the ground-floor with retail spaces. Bicycle parking would be provided. Vehicle parking would be on site.
<b>Policy 4.2.4</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	<b>Consistent.</b> The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
<b>Policy 4.2.5.</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	<b>Consistent.</b> The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and the Santa Monica Big Blue Bus. The Metro Expo Line opened in May 2016 and has a station south of the Site at Bundy and Exposition.
<b>Policy 4.3.1.</b> Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	<b>Not Applicable.</b> This policy calls for City updates to its General Plan.
<b>Policy 4.3.2.</b> Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	<b>Not Applicable.</b> This policy calls for City updates to its General Plan.
<b>Policy 5.1.1.</b> Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	<b>Not Applicable.</b> This policy calls for cleaner operations of the City's water port and airport facilities.
<b>Policy 5.1.2</b> Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	<b>Consistent.</b> The Project will comply with CalGreen requirements as required by LA Green Building Code. In addition, the Project will include several features that will help to minimize energy consumption, including access to public transportation and designated bike storage areas.
<b>Policy 5.1.3.</b> Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	<b>Not Applicable.</b> This policy calls for cleaner operations of the City's Water and Power energy plants.
<b>Policy 5.1.4.</b> Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	<b>Not Applicable.</b> This policy calls for City facilities to reduce solid waste and energy consumption.
<b>Policy 5.2.1.</b> Reduce emissions from its own vehicles by	<b>Not Applicable.</b> This policy calls for the City to

**Table 3.3-5  
General Plan Air Quality Element**

<b>Policy</b>	<b>Analysis</b>
continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
<b>Policy 5.3.1.</b> Support the development and use of equipment powered by electric or low-emitting fuels.	<b>Consistent.</b> The Project would be designed to meet the applicable requirements of the State Green Building Standards Code and the City of Los Angeles' Green Building Code.
<b>Policy 6.1.1.</b> Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	<b>Not Applicable.</b> This policy calls for the City to promote clean air awareness through its public awareness programs.
<i>Table: CAJA Environmental Services, May 2016.</i>	

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

**Less Than Significant Impact with Mitigation Incorporated.** A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ).

**Construction Phase**

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 20 months (some phases would overlap as noted in Table 2-5, of Section 2). Table 3.3-6 summarizes the proposed construction schedule that was modeled for air quality impacts.

**Table 3.3-6  
Construction Schedule**

<b>Phase</b>	<b>Duration</b>	<b>Notes</b>
Demolition	6 weeks	Debris from 24,684 square feet of and 486 cubic yards of asphalt hauled off-site

Phase	Duration	Notes
Site Preparation	2 weeks	
Grading	2 months	49,220 cubic yards of soil export to Moorpark facility 42 miles each way
Construction	18.5 months	Construction would overlap with portions of the grading and excavation phase
Architectural Coatings	2 months	Coatings would overlap with construction phase
<i>Source: Client assumptions, May 2016.</i>		

As shown in Table 3.3-7, the construction of the Project will produce VOC, CO, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions that do not exceed the SCAQMD's regional thresholds. However, daily NO<sub>x</sub> emissions could exceed the SCAQMD's threshold of significance for this ozone precursor if both site grading and building construction were to occur concurrently. As a result, construction of the Project could contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered significant but mitigable.

In terms of local air quality, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for CO during the construction phase. However, construction activities could produce NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during any concurrent grading and building construction phases. As a result, construction impacts on localized air quality are considered significant but mitigable.

**Table 3.3-7**  
**Estimated Daily Construction Emissions - Unmitigated**

Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	21	186	150	<1	20	14
2018	53	95	90	<1	7	6
Maximum Regional Total	53	186	150	<1	20	14
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	<b>Yes</b>	No	No	No	No
Maximum Localized Total	53	144	114	<1	15	12
Localized Significance Threshold	--	103	562	--	4	3
Exceed Threshold?	No	<b>Yes</b>	No	No	<b>Yes</b>	<b>Yes</b>
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Northwest Coastal LA County source receptor area.</i>						

There are several regulatory compliance measures that must be implemented under SCAQMD Rule 403, which governs fugitive dust emissions. The following regulatory compliance measures addresses fugitive dust emissions of PM<sub>10</sub> and PM<sub>2.5</sub> that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3.3-7 conservatively does not assume the application of BACMs to control fugitive dust. The regulatory measures would also require that all coatings comply with SCAQMD Rule 1113, which governs the VOC content of coatings.

### ***Regulatory Compliance Measures***

**RCM-3-1** Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

**RCM-3-2** Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

**RCM-3-3** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

**RCM-3-4** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

### ***Construction Mitigation Measures***

**Mitigation Measure 3-1** calls for the use of readily-available construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related PM<sub>10</sub> and PM<sub>2.5</sub> emissions.

**MM-3-1** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at the Project Site. In

addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by ARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided to the Department of Building and Safety.

### ***Construction Phase Air Quality Impacts After Mitigation***

As shown in Table 3.3-8, implementation of Mitigation Measure 3-1 and regulatory compliance measures would substantially reduce on-site NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions during the construction process, particularly during the site preparation and grading phases. As a result, construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

**Table 3.3-8**  
**Estimated Daily Construction Emissions - Mitigated**

Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	5	59	145	<1	6	3
2018	41	17	90	<1	1	<1
Maximum Regional Total	41	59	145	<1	6	3
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	41	48	112	<1	2	2
Localized Significance Threshold	--	103	562	--	4	3
Exceed Threshold?	No	No	No	No	No	No
Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Northwest Coastal LA County source receptor area.						

### **Operational Phase**

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 1,006 net vehicle trips to and from the Project site

on a peak weekday at the start of operations in 2019.<sup>18</sup> Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> emissions (Table 3.3-9). As a result, the Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Project would emit minimal emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from area and energy sources on-site. As shown in Table 3.3-9, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality are considered less than significant.

The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

**Table 3.3-9**  
**Estimated Daily Operations Emissions - Unmitigated**

Emissions Source	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	5	<1	16	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	7	20	80	<1	15	4
Total Operations	12	21	96	<1	15	4
Existing Operations	-3	-4	-16	<1	-2	-1
Net Regional Total	8	16	79	<1	13	3
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	4	<1	8	<1	<1	<1
Localized Significance Threshold	-	103	562	-	1	1
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning 2016 based on CalEEMod 2013.2.2 model runs. Data in Appendix B to this IS/MND. Numbers may not add up due to rounding.						

- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or**

<sup>18</sup> Overland Traffic Consultants, Inc., Traffic Impact Study for a Mixed-Use Project at 1500 Granville Avenue; April 2016.

**state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

**Less Than Significant with Mitigation Incorporated.** Construction of the Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants (see Table 3.3-8). For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. As such, the Project's impact on cumulative ozone precursor emissions would be considered less than significant. Similarly, regional emissions of PM<sub>10</sub> and PM<sub>2.5</sub> would not exceed mass thresholds established by the SCAQMD (see Table 3.3-8); therefore, construction emissions impacts would be considered less than significant.

**Construction**

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. There are six proposed developments within a 600-foot vicinity of the Project site that were identified by the project's traffic study.<sup>19</sup>

- No. 1 – 11660 Santa Monica Boulevard, 58,000 square feet supermarket
- No. 4 – 1466 Westgate Avenue, 65,000 square feet recreation center
- No. 36 – 11852 Santa Monica Boulevard, 39 unit apartment and 10,750 square feet auto dealership
- No. 37 – 11800 Santa Monica Boulevard, 150 unit apartment and 40,000 square feet retail
- No. 46 – 1519 Granville Avenue, 40 unit apartment
- No. 47 – 1515 Westgate Avenue, 100 unit apartment

If any other of these proposed projects were to undertake construction concurrently with the Project, localized CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub> concentrations would not exceed ambient air quality standards at nearby receptors for the following reasons. The application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub>. Any projects that would exceed LST thresholds would perform dispersion modeling to confirm whether health-based air quality standards would be violated and mitigate any significant localized emissions accordingly. Receptors that are located further away would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric

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<sup>19</sup> Overland Traffic Consultants, Inc., *Traffic Impact Study for a Mixed-Use Project at 1500 Granville Avenue*; April 2016.

stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM<sub>10</sub> that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

Construction of the Project would produce cumulative considerable emissions of localized nonattainment pollutants PM<sub>10</sub> and PM<sub>2.5</sub> (see Table 3.3-7), as the anticipated emissions would exceed LST thresholds set by the SCAQMD. This is considered a significant but mitigable impact.

**Mitigation Measure MM-3-1** and regulatory compliance measures would require the use of cleaner off-road construction equipment and good housekeeping measures that substantially reduce PM<sub>10</sub> and PM<sub>2.5</sub> emissions during on-site construction activities. Construction of the Project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors with implementation of **Mitigation Measure 3-1** and regulatory compliance measures. Impacts would be less than significant.

### **Operation**

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level (see Table 3.3-9). Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table 3.3-9, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a residential and commercial project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM<sub>10</sub> and PM<sub>2.5</sub> would be minimal. Similarly, existing land uses in the area include residential and commercial land uses that do not produce substantial emissions of localized nonattainment pollutants. Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant. Impacts would be less than significant.

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

**Less Than Significant with Mitigation Incorporated.** Construction of the Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

- 1525 South Granville Avenue, a multi-family residential building approximately 80 feet west of the project site, at approximately the same elevation.
- 1527 South Granville Avenue, a multi-family residential building approximately 70 feet south of the site, at approximately the same elevation.
- 1524 South Granville Avenue, a multi-family residential building approximately 150 feet south of the site, at approximately the same elevation.



- 11852 Santa Monica Boulevard, proposed multi-family residential building approximately 120 feet west of the site, at approximately the same elevation.
- University High School, a public high school with outdoor playgrounds approximately 295 feet north of the site, at approximately the same elevation.
- 11800 Santa Monica Boulevard, proposed multi-family residential and retail building approximately 60 feet west of the site, at approximately the same elevation.

### **Construction**

As illustrated in Table 3.3-7, these nearby receptors could be exposed to substantial concentrations of localized pollutants PM<sub>10</sub> and PM<sub>2.5</sub> from construction of the Project. Specifically, construction activities would exceed SCAQMD LST thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> and represent a significant but mitigable impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

**Mitigation Measure MM-3-1** and regulatory compliance measures would require the use of off-road construction equipment and good housekeeping measures that substantially reduce PM<sub>10</sub> and PM<sub>2.5</sub> emissions during on-site construction activities. Construction of the Project would not have any significant impacts on pollutant concentrations at nearby receptors with implementation of **Mitigation Measure MM-3-1** and regulatory compliance measures.

### **Operation**

The Project would generate long-term emissions from mobile sources that would generate negligible pollutant concentrations of CO, NO<sub>2</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub> at sensitive receptors and would be considered less than significant. Long-term operations of the Project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area because the Project Area's climate does not experience extremely cold conditions. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO nonattainment areas focus on emissions from traffic intersections where air quality may get worse.<sup>20</sup> Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO

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<sup>20</sup> Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

modeling. Traffic levels of service at the 17 intersections studied in the vicinity of the Project would not be significantly impacted (due to mitigation) by traffic volumes from the development under existing or 2019 horizon scenarios.<sup>21</sup> In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode (due to the weather) or substantially worsen traffic flow.

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by ARB based on chronic exposure to these emissions.<sup>22</sup> However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.<sup>23</sup> The Project's operation would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant.

Long-term operation of the Project would not have any significant impacts on pollutant concentrations at nearby receptors. Impacts would be less than significant.

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

**Less Than Significant Impact.** Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project would introduce commercial and residential uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses such as SCAQMD Rule 1138 (Control of

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<sup>21</sup> Overland Traffic Consultants, Inc., *Traffic Impact Study for a Mixed-Use Project at 1500 Granville Avenue*; April 2016.

<sup>22</sup> California Office of Environmental Health Hazard Assessment. *Health Effects of Diesel Exhaust*. [www.  
http://oehha.ca.gov/public\\_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html)

<sup>23</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

Emissions from Restaurant Operations). As a result, any odor impacts from the Project would be considered less than significant.

#### 4. BIOLOGICAL RESOURCES

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

**No Impact.** A significant impact would occur if a project were to remove or modify habitat for any species identified or designated 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<sup>24</sup> (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is zoned C2-1VL (Commercial Zone, Height District 1-Very Limited) and the General Plan land use designation for the Site is General Commercial. The Project Site contains a former auto dealership and is completely paved. There are no trees or vegetation on the Project Site. There are five street trees on the City sidewalk along Santa Monica Boulevard. These are off-site street trees that are part of the City's planting program and not native originating (natural to the location) trees. There are no City or county significant ecological areas on the Project Site or near the Project Site's vicinity.<sup>25</sup> The Project will not result in take of nesting native bird species. Therefore, the Project will not have a direct impact on any identified species because none are present on this highly urbanized Project Site and the Project will not modify any habitat that would affect identified species because no habitat exists on this highly urbanized Project Site. Accordingly, no impact will occur.

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

**No Impact.** A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.<sup>26</sup> Therefore, no impact will occur.

- c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal**

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<sup>24</sup> Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: <http://www.dfg.ca.gov/about/namechange.html>

<sup>25</sup> Navigate LA, Significant Ecological Areas layer: <http://navigate.la.city.org/navigate/>

<sup>26</sup> U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, February 19, 2016.

**pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland is a 1.02 acre path approximately 3,500 feet from the Project Site that runs from Montana Avenue to Wilshire Boulevard, between Wellesley Avenue and Centinela Avenue. It is classified as Freshwater Forested/Shrub Wetland.<sup>27</sup> This habitat area is not near the Project Site and will not be affected by Project construction or operations. Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

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

**No Impact.** A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to existing urban development on the Site and in the adjacent surroundings, the Site does not function as a corridor for the movement of native or migratory animals. Additionally, no native wildlife nurseries are located in the project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

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

**Less Than Significant with Mitigation Incorporated.** A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. The Project Site is located in an urbanized area of the City. There are no trees or vegetation on the Project Site. There are five street trees on the City sidewalk along Santa Monica Boulevard. These off-site street trees are part of the City's planting program and not native originating (natural to the location) trees. If the Project were to impact these trees, a potential impact may result due to the loss of trees in the public right-of-way. However, this potential impact will be mitigated to less than significant level by **Mitigation Measure MM-4-1**.

### **Mitigation Measure**

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<sup>27</sup> U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, February 19, 2016.

**MM-4-1 Tree Removal (Public Right-of-Way)**

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24- inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

**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.** A significant impact would occur if a project conflicts with a habitat conservation plan. The Project Site is located in an urbanized area of the City. Due to the existing urban development in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. There are no City or county significant ecological areas.<sup>28</sup> The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans or other approved local, regional or state habitat conservation plan will occur.

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<sup>28</sup> Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>, February 19, 2016.

## 5. CULTURAL RESOURCES

The section is based in part on the following items, included as Appendix C of this IS/MND:

**C-1** Tribal Consultation List, Native American Heritage Commission, March 11, 2016.

**C-2** Archeology response, South Central Coastal Information System, March 24, 2016.

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

**No Impact.** *State CEQA Guidelines* Section 15064.5 defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

### Regulatory Setting

#### *National Register of Historic Places*

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:<sup>29</sup>

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

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<sup>29</sup> Title 36 Code of Federal Regulations Part 60.4.

### *Physical Integrity*

According to *National Register Bulletin #15*, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”<sup>30</sup> Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

### *Context*

To be eligible for listing in the National Register, a property must also be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”<sup>31</sup> A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

### ***California Register of Historical Places***

California Register criteria are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

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

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling

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<sup>30</sup> *National Register Bulletin #15*, pp. 44-45.

<sup>31</sup> *National Register Bulletin #15*.p. 7.



legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.<sup>32</sup>

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [California Office of Historic Preservation (OHP)] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

#### ***State Office of Historic Preservation Survey Methodology***

The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

#### ***City of Los Angeles Cultural Heritage Ordinance***

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<sup>32</sup> Public Resources Code Section 4852.

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. As stated in the Cultural Heritage Ordinance Section 22.171.7, a property must meet at least one of four criteria for HCM designation:

- 1) be a reflection of the broad cultural, economic, or social history of the nation, state or community;
- 2) be identified with historic personages or important events in the main currents of national, state, or local history;
- 3) embody the characteristics of an architectural-type specimen inherently valuable for a study of a period, style, or method of construction; or
- 4) be the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

### **Determining the Significance of Impacts on Historical Resources**

#### ***The State CEQA Guidelines***

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is materially impaired.

The Guidelines go on to state that the significance of a historic resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.<sup>33</sup>

#### ***City of Los Angeles' "L.A. CEQA Thresholds Guide"***

- Demolition of a significant resource;

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<sup>33</sup> 14 CCR Section 15064.5(b)(2).

- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

### **Potential Project Impacts**

None of the Project Site's structures are considered historic resources subject to CEQA. The Project's demolition of the existing structures, therefore, will not involve the demolition of any historic resources. The Site is not identified by the City in any HPOZs, HCM, or Historic Preservation Review.<sup>34</sup> According to the City's Office of Historic Resources, the property is not designated and was not recorded by SurveyLA or any other survey.<sup>35</sup> Moreover, the applicant has been issued a demolition permit to remove the existing buildings.<sup>36</sup> As such, the City has not indicated that the buildings are an historic resource based on available information. The Project will have no significant impact, and no mitigation measures are required.

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

**Less Than Significant Impact.** Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings. As discussed above, the existing buildings are not historic resources subject to CEQA. The Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Thus, there is the potential for buried archeological, prehistoric and historic resources within the Project Site. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

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<sup>34</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

<sup>35</sup> Office of Historic Resources, December 6, 2016.

<sup>36</sup> Application for Inspection to Demolish Building or Structure, Department of Building and Safety. Issued June 23, 2014, Application # 14019-30000-01927 (for 11760 Santa Monica Boulevard), and Application Issued June 23, 2014, Application # 14019-30000-01914 (for 1514 Granville Avenue).

***Regulatory Compliance Measure***

**RCM-5-1      Archaeological**

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

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

**Less Than Significant Impact.** A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading to level the Site. Thus, there is still the potential for buried paleontological resources within the Project Site. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

***Regulatory Compliance Measure***

**RCM-5-2      Paleontological**

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

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

**Less Than Significant Impact.** A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The absence of

archaeological or Native American sacred places does not preclude their existence at the subsurface level. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading to level the Site. As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 require public agencies to consult with California Native American Tribes identified by the Native American Heritage Commission (NAHC) for the purpose of mitigating impacts to tribal cultural resources. The Project would comply with this requirement. The NAHC was contacted and a consultation tribal list was received on March 11, 2016 (included as an Appendix to this IS/MND). Environmental impacts may result from project implementation due to discovery of unrecorded human remains. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

### ***Regulatory Compliance Measure***

#### **RCM-5-3      Human Remains**

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

1. Stop immediately and contact the County Coroner:  
  
1104 N. Mission Road  
Los Angeles, CA 90033  
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or  
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
2. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
3. The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American.
4. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
5. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

## 6. GEOLOGY AND SOILS

The section is based in part on the following reports, included as Appendix D of this IS/MND:

- D-1 Geotechnical Investigation, Geocon West, Inc., May 2016.
  - D-2 Report of Fault Rupture Hazard Investigation, Geocon West, Inc., May 2016.
  - D-3 **Geology Report Approval Letter, Los Angeles Department of Building and Safety. May 27, 2016.**
  - D-4 **Soils Report Approval Letter, Los Angeles Department of Building and Safety. June 15, 2016.**
- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
    - (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles.

### **Santa Monica Fault Zone**

The Santa Monica Fault Zone (SMFZ) trends west to east, from the Santa Monica area to the Hollywood area, and is part of a regional fault system that extends for nearly 125 miles along the southern boundary of Transverse Ranges. This fault system is referred to as the Malibu Coast-Santa Monica-Raymond-Cucamonga fault system. This complex system of west to east trending faults accommodates north-south shortening and uplift, and concurrent westward motion of the Western Transverse Ranges. Individual faults within the TRSB fault system exhibit varying degrees of both left-lateral strike-slip and contractional dip-slip faulting and related folding. All faults within the TRSB fault system show evidence for Quaternary activity and several, including the Santa Monica and Hollywood fault zones, have been demonstrated by site-specific paleoseismic studies to be active during Holocene time.

The SMFZ is an oblique-reverse, left-lateral fault that is thought to be a surface expression of tectonic deformation related to Pliocene-Quaternary structural development of the Santa Monica Mountains. Integration of subsurface oil and gas exploration seismic data and well logs with surficial mapping indicate the mountains are underlain by a large southward-vergent asymmetric anticline formed over a regional north-dipping thrust ramp at a depth of 6 to 9 miles. Davis and Namson (1994) have interpreted the Santa Monica anticlinal structure as a regional-scale fault propagation fold with a steep south-facing

forelimb. The SMFZ is shown in their model as an out-of-sequence high-angle fault that branches upward from the main fault ramp (Santa Monica Mountains blind thrust), breaches the forelimb, and extends to the near-surface. Geophysical studies conducted at the Veteran's Administration (VA) property in West Los Angeles indicate the SMFZ is a gently dipping thrust fault with secondary near-vertical faults extending from the primary basal fault toward the ground surface as shown below.

Much of the surface expression of the SMFZ is limited to fault-related geomorphic features, many of which have been destroyed by urbanization within the greater Los Angeles area. In the West Los Angeles area (west of the 405 Freeway), three left-stepping topographic scarps have been interpreted by Dolan et al. (2000) to represent the approximate location of the fault in the area. The easternmost of the three scarps trends northeast through the southern portion of the VA property and the central portion of the University High School Campus. The topographic scarp is generally coincident with the northern limit of the secondary faulting or hanging wall deformation associated with the primary basal rupture surface of the SMFZ. These secondary hanging-wall faults exhibit normal displacement but are thought to be primarily left-lateral strike-slip.

### **Local Fault Studies**

The location and activity of the fault has been verified by subsurface exploration across the geomorphic scarp at the VA property and at University High School. The Dolan et al. (2000) investigation at the VA property is one of the most detailed paleoseismic studies of the SMFZ. Dolan et al. (2000) excavated two trenches across the topographic scarp. Trench stratigraphy with carbon-14 (<sup>14</sup>C) numerical agecontrol provided the basis for evaluating total slip, slip rate, and the number and age of displacement events. Dolan et al. (2000) identified five to six ground-rupturing events in the stratigraphic record between approximately 50,000 years and 1,000 to 3,000 years. These events suggest a recurrence interval of about 7,000 to 8,000 years for the SMFZ (Dolan et al., 2000, p.1573). Trenching studies and seismic reflections profiles at the VA property (Crook et al., 1983; Pratt et al., 1998; Dolan et al., 2000; Catchings et al., 2001) indicate that a series of steeply dipping to sub-vertical faults that offset late Quaternary age sediments are present in the area of the geomorphic scarp. The seismic reflection data (Pratt et al., 1998) indicate that the fault zone at the VA property is limited to a fairly narrow zone, 130 to 190 feet wide, and does not separate into widely spaced splays. Site-specific fault rupture hazard investigations at University High School (Mactec, 2004, 2007) and Brockton Avenue Elementary School support this conclusion.

These campuses are underlain by Holocene age alluvial deposits (restricted to the southern portion of the campus) and Pleistocene age older alluvial fan deposits underlain by a near-shore marine sequence of sediments that includes Estuary Deposits and Beach Sand (Mactec, 2004, 2007). Mactec (2004, 2007) interprets the age of the near-shore marine sequence to be associated with the Stage 5e high sea level stand (approximately 120,000 years). Mactec (2004, 2007) concludes that the University High School campus is bisected by a zone of near-surface, vertical and sub-vertical faults trending N50°E to N55°E and approximately 85 to 125 feet wide, confined to the area of the topographic scarp. The fault forms a groundwater barrier with shallow groundwater conditions in the area immediately north of the fault zone and much deeper groundwater levels south of the fault zone. A minimum apparent vertical throw of about

75 feet is interpreted based on elevations of the top of the near-shore marine sequence (Mactec, 2004). Also, a significant component of strike-slip motion was interpreted based on the differing thickness of geologic units across individual fault splays.

North of the fault zone, geologic units were interpreted to be relatively flat-lying and distinct units were laterally traceable and continuous to the northern campus boundary. The Mactec (2004, 2007) investigations define the northernmost boundary of the SMFZ and clearly demonstrate that the stratigraphic section north of the fault zone is unfaulted and relatively flat-lying and undeformed with no evidence of off-fault deformation. The faults identified on these campuses are interpreted to traverse the area in a generally northeasterly direction and are generally confined to the area of the south-facing escarpment that forms the contact between the Holocene age alluvial sediments from the Pleistocene age older alluvial deposits. The previous studies at the VA property (Dolan et al., 2000; Pratt et al., 1998), University High School Mactec (2004, 2007), and Brockton Avenue Elementary School found that the Pleistocene age alluvial surface north of the topographic scarp is undeformed and that the northern limit of the secondary faulting or hanging wall deformation associated with the primary basal rupture surface of the SMFZ is generally confined to the area of the geomorphic scarp.

### **Wilshire-Bundy Building Excavation**

A splay of the Santa Monica Fault Zone was reportedly observed in a building excavation along the southwest corner of Wilshire Boulevard and Bundy Drive, however, the fault trace could not be properly documented prior to being covered with concrete during construction (Crook et al., 1992; Dolan et al., 2000). Excavations conducted at the site encountered groundwater at a depth of 69 feet beneath the existing ground surface while a second excavation at the northwest corner of the site encountered groundwater at a depth of 16 feet beneath the existing ground surface (Dolan et al., 2000). The varying groundwater levels suggest a fault-related groundwater barrier is present at the site. The location of the groundwater barrier occurs along the same geomorphic scarp as University High School, Brockton Avenue Elementary School, and the VA Hospital where the SMFZ has been previously documented.

### **Field Investigation**

Trenching is typically the most common and desirable method to investigate the absence or presence of faulting because of the direct visual observation and correlation of the stratigraphic units that is possible. However, based on the thickness of the Holocene age alluvium in the area (on the order of 25 feet) and existing structures, excavation of a trench is not feasible. Alternately, as discussed with the city geologist, our field exploration included advancement of seven continuous-core hollow-stem auger borings along the eastern boundary of the site. The borings were drilled along one northwest-trending exploration transect (Transect A) generally perpendicular to the trend of observed and inferred splays of the SMFZ in the immediate area. Five of the borings were laterally spaced approximately 15 to 45 feet apart and advanced to an approximate depth of approximately 75 feet beneath the ground surface using a truck-mounted CME-95 hollow-stem auger drilling machine. Two of the borings (B-6 and B-7) were drilled along the northern site boundary adjacent to Santa Monica Boulevard at inclinations of 45° and 70°,



respectively. The purpose of the inclined borings was to investigate the potential for faulting within 50 feet of the northern property line as required by the LADBS Grading Division.

Based on the results of Geocon West's investigation, they conclude the following:

1. No faults or fault-related features were observed along the exploration transects.
2. Multiple laterally continuous, unfaulted Pleistocene age marker beds were observed across the site and at least 50 feet north and south of the site.
3. No topographic or geomorphic lineaments were observed to traverse or project toward the site.
4. With a high degree of certainty, active faults (as defined by the State of California [Bryant and Hart, 2007]) do not directly impact the site.

The results of Geocon West's investigation confirm active faults are not present at the Site and no restrictions on future development of the Site are necessary with respect to potential faulting, beyond the standard seismic engineering requirements for all buildings in California. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury. Therefore, impacts related to rupture of known earthquake fault will be less than significant.

#### **(ii) Strong seismic ground shaking?**

**Less Than Significant Impact.** The Project Site is located within a seismically active region. As with all of Southern California, the Site has experienced historic earthquakes from various regional faults. Based on historical seismicity of the Los Angeles Basin and the location of nearby faults, the Site could be subjected to severe ground shaking in the event of an earthquake. The hazard is common in Southern California and the effects of ground shaking can be mitigated if the Project is designed and constructed with current building codes and engineering practices.<sup>37</sup> Thus, the design of the Project in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits) will mitigate the potential effects of strong ground shaking. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk of loss, injury or death. Therefore, impacts related to seismic ground shaking will be less than significant.

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<sup>37</sup> *Geotechnical Investigation, Geocon West, Inc., May 2016.*

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

**Less Than Significant Impact.** Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth of groundwater. A review of the State of California Seismic Hazard Zone Map for the Beverly Hills Quadrangle indicates that the Project Site is located in an area designated as “liquefiable”. In addition, the Safety Element of the City of Los Angeles General Plan indicates that the Project Site is located within an area identified as having the potential for liquefaction. The liquefaction analysis indicates that 50 feet of alluvial soils below the proposed structures could be prone to 2.9 inches of total settlement during Maximum Considered Earthquake ground motion.<sup>38</sup> Based on these considerations, it is recommended that the proposed structure be designed for a differential settlement equal to two-thirds of the total anticipated seismic settlement, or 1.67 inch over a distance of 50 feet. These settlements are in addition to the static settlements indicated below and must be considered in the structural design. These would be including in the building design per the requirements of the Geotechnical Investigation and LADBS Approval Letter. Therefore, impacts with respect to liquefaction will be less than significant.

**(iv) Landslides?**

**No Impact.** A project-related significant adverse effect may occur if the Project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site and adjacent sites are relatively flat to sloping gently to the south. The Project Site is not located within a City of Los Angeles Hillside Area, Landslide Area, or Special Grading Area. A review of the State of California Seismic Hazard Zone Map for the Beverly Hills Quadrangle indicates the Site is not within an area identified as having the potential for seismic slope instability. There are no known landslides near the Site, nor is the Site in the path of any known or potential landslides. The potential for slope stability hazards is considered low.<sup>39</sup> Therefore, no impacts related to landslides will occur.

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

**Less Than Significant Impact.** A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing building) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. The entire Site is approximately 1.34 acres. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur. The Project will contain three

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<sup>38</sup> *Geotechnical Investigation, Geocon West, Inc., May 2016.*

<sup>39</sup> *Geotechnical Investigation, Geocon West, Inc., May 2016.*

subterranean levels (approximately 21 feet below grade) in addition to any other excavation typically required for foundation and utility work.

In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of the BMPs detailed in the required SWPPP, soil erosion during construction impacts will be less than significant. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

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

**Less Than Significant with Mitigation Incorporated.** A significant impact may occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the Project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Additionally, as discussed in the response the Question 6(a)(iii) and 6(a)(iv), the Project Site is not at significant risk for liquefaction or landslides.

Dynamic compaction of weakly consolidated soils may occur during a major earthquake. Typically, settlements occur in thick beds of granular soils. Based on the depth of the proposed structure foundation, appreciable seismic settlements are not expected.<sup>40</sup>

It is estimated that shoring will be required to maintain a stable excavation during construction of the below grade parking levels. The applicant has submitted a geotechnical report that was approved by the

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<sup>40</sup> *Geotechnical Investigation, Geocon West, Inc., May 2016.*

Department of Building and Safety. The Project would comply with all conditions and recommendations of the reports and approval letters. This is included as **Mitigation Measure MM-6-1**. Therefore, any potential impacts related to building loads and construction will be less than significant.

***Mitigation Measure***

**MM-6-1      Geotechnical Report and Approval Letters**

- The Project shall comply with the recommendations contained within the geotechnical report and fault rupture report.
- The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letters for the Project, and as they may be subsequently amended or modified. All recommendations of the geotechnical report and fault rupture report, which are in addition to, or more restrictive than the conditions contained in the approval letters shall be incorporated into the plans for the Project.

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

**Less Than Significant Impact.** A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area.

The soils encountered at the proposed basement level have a low expansive potential. The recommendation of the Geotechnical Investigation assumes that building foundations and slabs will derive support in these materials.<sup>41</sup> The applicant has submitted a geotechnical report that was approved by the Department of Building and Safety. The Project would comply with all conditions and recommendations of the geotechnical investigation and LADBS approval letter. Impacts related to expansive soils will be less than significant.

**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 in an urbanized area within the City of Los Angeles, which is

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<sup>41</sup> *Geotechnical Investigation, Geocon West, Inc., May 2016.*

served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

## 7. GREENHOUSE GAS EMISSIONS

The section is based in part on the following item, included as Appendix B of this IS/MND:

**B** Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, May 2016.

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

**Less Than Significant Impact.** The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single Project's impact will be negligible. To further complicate this, there is debate about whether a Project's emissions are adding to the GHG emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO<sub>2</sub> into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO<sub>2</sub> in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a Project's incremental contribution of CO<sub>2</sub> into the atmosphere, it is typically not possible to determine whether or how an individual Project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

### **Pollutant and Effects**

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is retained, warming the atmosphere. This phenomenon is known as the greenhouse effect. GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO<sub>2</sub>) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO<sub>2</sub> emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO<sub>2</sub> comprises over 80 percent of GHG emissions in California.<sup>42</sup>

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<sup>42</sup> California Environmental Protection Agency, *First Update to the Climate Change Scoping Plan*, May 2014.

- Methane (CH<sub>4</sub>) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Methane makes up 8.3 percent of all GHGs, and mobile sources and general fuel combustion represent 0.69 percent of overall methane emissions.<sup>43</sup>
- Nitrous Oxide (N<sub>2</sub>O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 12 percent of N<sub>2</sub>O emissions.<sup>44</sup> N<sub>2</sub>O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF<sub>6</sub>) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF<sub>6</sub> are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.<sup>45</sup> As shown in Table 3.7-1, the other GHGs are less abundant but have higher GWP than CO<sub>2</sub>. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted. High GWP gases such as HFCs, PFCs, and SF<sub>6</sub> are the most heat-absorbent.

**Table 3.7-1**  
**Global Warming Potential For Greenhouse Gases**

<b>Greenhouse Gas</b>	<b>Global Warming Potential Factor (100-Year)</b>
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	28

<sup>43</sup> California Environmental Protection Agency, *First Update to the Climate Change Scoping Plan*, May 2014.

<sup>44</sup> United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N<sub>2</sub>O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001.

<sup>45</sup> California Air Resources Board, *Climate Change Emission Control Regulations*, 2004

Nitrous Oxide (N <sub>2</sub> O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF <sub>6</sub> )	23,500
<i>Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014. Global warming potential measures how much heat a GHG traps in the atmosphere, such as over a 100-year period.</i>	

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21<sup>st</sup> century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

## **Regulatory Setting**

### ***International***

#### ***Kyoto Protocol***



In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt. The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11<sup>th</sup> session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that \$100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016 and ratified by 177 countries.

#### *The Western Regional Climate Action Initiative (WCI)*

The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

## ***Federal***

The U.S. Environmental Protection Agency has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.<sup>46</sup> In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon. In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding \$8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

### *Vehicle Standards*

Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (NHTSA) joint rulemaking for vehicle standards.

### *Energy Independence and Security Act (EISA)*

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

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<sup>46</sup> *Massachusetts v. Environmental Protection Agency et al* (127 S. Ct. 1438 [2007])

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

### ***State***

#### *Assembly Bill 1493*

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by vehicles used for personal transportation.

#### *Executive Order S-3-05*

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team (“CAT”) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.<sup>47</sup> Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.<sup>48</sup> According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

#### *Executive Order B-30-15*

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State’s GHG targets with those set in October 2014 by the European Union and is intended to help the State meet its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement

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<sup>47</sup> California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006.

<sup>48</sup> California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 57.

measures accordingly and directs the CARB to update the Climate Change Scoping Plan. A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.<sup>49</sup>

#### *Assembly Bill 32*

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.<sup>50</sup> On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO<sub>2</sub> per year and make up 94 percent of the point source CO<sub>2</sub> emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

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<sup>49</sup> Greenblatt, Jeffrey, *Energy Policy*, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).

<sup>50</sup> California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).<sup>51</sup> ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.<sup>52</sup> Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent) to achieve 1990 levels.

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan (First Update), recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons (MMT) MMTCO<sub>2</sub>e 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 MMTCO<sub>2</sub>e. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the First Update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 MMTCO<sub>2</sub>e or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies

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<sup>51</sup> California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED)*, Attachment D, August 19, 2011.

<sup>52</sup> California Air Resources Board, *Greenhouse Gas Inventory – 2020 Emissions Forecast*, <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>. Accessed June 2014.

recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.<sup>53,54</sup>

As shown in Table 3.7-2, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

**Table 3.7-2  
Emission Reductions Needed To Meet AB 32 Objectives In 2020**

<b>Sector</b>	<b>Million Metric Tons of CO<sub>2</sub>e Reduction</b>	<b>Percent of Statewide CO<sub>2</sub>e Inventory</b>	<b>Summary of Recommended Actions</b>
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
<b>Total</b>	<b>-78</b>	<b>-15.3%</b>	

<sup>53</sup> CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the “electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles.”]

<sup>54</sup> CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014.

*Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.*

### *Cap And Trade*

ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration. Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO<sub>2</sub>e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO<sub>2</sub>e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by ARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,<sup>55</sup> the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.<sup>56</sup> However, ARB has

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<sup>55</sup> *California Health & Safety Code § 38551(a)* ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.")

expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The “recommended action” in the First Update for the Cap-and-Trade Program is: “Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target.”<sup>57</sup> The “expected completion date” for this recommended action is 2017.<sup>58</sup> It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

#### *Senate Bill 1368*

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

#### *SB 97 & CEQA Guidelines*

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor’s Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project’s GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB’s recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis; and

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<sup>56</sup> See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.

<sup>57</sup> CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, at 98 (May 2014).

<sup>58</sup> *Id.*



- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

#### *State Bill 375*

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (“MPOs”) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.<sup>59</sup>

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO<sub>2</sub>e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.<sup>60</sup> There is currently no timetable for finalized thresholds.

On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.<sup>61</sup> For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—ARB adopted Regional Targets for reduction of GHG

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<sup>59</sup> American Planning Association, *California Chapter, Analysis of SB 375*, <http://www.calapa.org/-en/cms/?2841>.

<sup>60</sup> California Air Resources Board. <http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>

<sup>61</sup> California Air Resources Board. *Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*. <http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf>

emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.<sup>62</sup>

#### *Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

#### *California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (CCR), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014.

#### *Regional*

##### *South Coast Air Quality Management District Recommendations for Significance Thresholds*

The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO<sub>2</sub> equivalent

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<sup>62</sup> CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

(MTCO<sub>2</sub>e) as a screening numerical threshold for stationary sources. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 MTCO<sub>2</sub>e for residential projects, 1,400 MTCO<sub>2</sub>e for commercial projects, and 3,000 MTCO<sub>2</sub>e for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 MTCO<sub>2</sub>e per service population as a 2020 target and 3.0 MTCO<sub>2</sub>e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO<sub>2</sub>e and the plan-level target for 2035 was 4.1 MTCO<sub>2</sub>e. The SCAQMD has not established a timeline for formal consideration of these thresholds.<sup>63</sup> In the meantime, the project level thresholds are used as a non-binding guide. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

#### SCAG Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the “RTP/SCS”) update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State’s goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of mitigation measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.<sup>64</sup> These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

#### ***Local (City of Los Angeles)***

##### *Green LA Plan*

In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

##### *ClimateLA Implementation Plan*

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<sup>63</sup> SCAG, *Final PEIR for the 2016-2040 RTP/SCS, Appendix G*. Accessible at [http://rtpscs.scag.ca.gov/Documents/peir/2012fPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf)

<sup>64</sup> Southern California Association of Governments, *Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8*

To implement the Green LA Plan, the City published “ClimateLA”, which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- **Green Building:** The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.
- **Energy:** Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.
- **Waste:** Reduce or recycle 70 percent of trash by 2015.
- **Open Space and Greening:** Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to “daylight” streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

#### *Mobility 2035 Plan*

On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City’s mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan’s call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

#### *Green Building Ordinance*

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.<sup>65</sup> Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally

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<sup>65</sup> *City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).*

ensures that projects exceed Title 24 (2013) standards by at least 10 percent.<sup>66</sup> The City's ordinance affects the following types of development:<sup>67</sup>

1. New non-residential building or structure of 50,000 gross square feet or more of floor area;
2. New mixed-use or residential building of 50,000 gross square feet or more in excess of six stories;
3. New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
4. The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
5. The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.
6. The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

*Section 99.04.304.1. Irrigation Controllers.* When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

*Section 99.04.303.4. Wastewater Reduction.* Each building shall reduce by 20 percent wastewater by one of the following methods:

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<sup>66</sup> U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396> February 26, 2015.

<sup>67</sup> Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

1. The installation of water conserving fixtures (water closets, urinals)
2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

*Section 99.04.304.2. Outdoor Potable Water.* Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

*Section 99.04.304.3. Irrigation Design.* Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

*Section 99.05.407.1. Weather Protection.* Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

*Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent.* Comply with Section 66.32 et seq. of the LAMC.

*Section 99.05.408.4. Excavated Soil and Land Clearing Debris.* 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

*Section 99.05.410.1. Recycling by Occupants.* Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

*Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction.* At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

*Section 99.05.504.4.6. Resilient Flooring Systems.* For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

## **Existing Emissions**

The Project site includes 24,684 square feet of a former auto dealership and service center with surface parking. As shown in Table 3.7-3, the existing development site generates about 714 metric tons of CO<sub>2</sub>e annually, with the majority of emissions generated by mobile sources traveling to and from the Project Site.

**Table 3.7-3**  
**Existing Annual CO<sub>2</sub>e Greenhouse Gas Emissions**

Scenario and Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Area Sources	<1	0	0	<1
Energy Sources	190	<1	<1	190
Mobile Sources	452	<1	0	452
Waste Sources	19	1	0	43
Water Sources	26	<1	<1	29
<b>Total Emissions</b>	<b>668</b>	<b>1</b>	<b>&lt;1</b>	<b>714</b>
<i>Metric tons per year. Numbers may not add up due to rounding.</i>				
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2. Data in Appendix B to this IS/MND.</i>				

## Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor’s Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project’s commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.<sup>68</sup> The General Reporting Protocol is based on the “Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard” developed by the World Business Council for Sustainable Development and the World Resources Institute through “a multi-stakeholder effort to

<sup>68</sup> California Climate Action Registry, *General Reporting Protocol Version 3.1*, January 2009, [www.sfenvironment.org/sites/default/files/fliers/files/ccar\\_grp\\_3-1\\_january2009\\_sfe-web.pdf](http://www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf), accessed March 2, 2015.

develop a standardized approach to the voluntary reporting of GHG emissions.”<sup>69</sup> Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol’s reporting requirements. The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).<sup>70</sup>

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.<sup>71</sup> For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”<sup>72</sup> Therefore, direct and indirect emissions have been calculated for the Project.

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<sup>69</sup> *Ibid.*

<sup>70</sup> *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

<sup>71</sup> *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2015.*

<sup>72</sup> *OPR Technical Advisory, p. 5.*



GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>73</sup>

### **Significance Criteria**

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a Project's impact on greenhouse gases and climate change applicable to this Project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

- A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:
- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

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<sup>73</sup> See [www.caleemod.com](http://www.caleemod.com).

- The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.<sup>74</sup> Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.”<sup>75</sup> Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.<sup>76</sup>

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<sup>74</sup> See [www.caleemod.com](http://www.caleemod.com).

<sup>75</sup> See [www.caleemod.com](http://www.caleemod.com).

<sup>76</sup> See, for example, *San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014)*, in which the SJVAPCD “determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO<sub>2</sub>e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, *Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project*, SCH No. 2012041014 (October 2014) ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar\\_neg\\_dec.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2)); SCAQMD, *Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project*, SCH No. 2013091029 (December 2014) ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2)); SCAQMD, *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD*

Although GHG emissions can be quantified, ARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.<sup>77</sup> Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.<sup>78</sup>

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- SB 375
- SCAG's Sustainable Communities Strategy; and
- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

## **Project Impacts**

### ***Construction***

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the 20-month duration of construction activities. As illustrated in Table 3.7-4, construction emissions of CO<sub>2</sub> would peak in 2017,

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*Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd\\_final.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2)); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2)).*

<sup>77</sup> *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2)*

<sup>78</sup> *14 CCR § 15064(h)(3).*

when up to 29,208 pounds of CO<sub>2</sub>e per day are anticipated following implementation of recommended Mitigation Measures 3-1 and regulatory compliance measures. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

**Table 3.7-4**  
**Estimated Construction Emissions - Mitigated**

Construction Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2017	29,136	3	0	29,208
2018	13,692	2	0	13,732
<i>Pounds per day</i>				
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2. Data in Appendix B to this IS/MND.</i>				

### **Operation**

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach mirrors the concepts used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place

when ARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in Table 3.7-5, the emissions for the Project as proposed are estimated to be 3,786 MTCO<sub>2</sub>e per year, and its associated ARB 2020 NAT scenario are estimated to be 5,481 MTCO<sub>2</sub>e per year, which shows the Project as proposed will reduce emissions by 31 percent from the ARB 2020 NAT scenario. The proposed emissions would represent a net 3,072 metric ton increase in annual emissions when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

**Table 3.7-5**  
**Estimated Annual CO<sub>2</sub>e Greenhouse Gas Emissions**

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	3	3	-	0%
Energy Sources	1,279	742	-537	-42%
Mobile Sources	3,884	2,727	-1,158	-30%
Waste Sources	56	56	-	0%
Water Sources	176	176	-	0%
Construction	82	82	-	0%
<b>Total Emissions</b>	<b>5,481</b>	<b>3,786</b>	<b>-1,695</b>	<b>-31%</b>
<b>Net Emissions</b>	<b>-</b>	<b>3,072</b>	<b>N/A</b>	<b>N/A</b>

*Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.*

*\* NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

*Source: DKA Planning, 2016.*

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the proposed project's impact (i.e., 15.3 percent reduction from NAT). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the project would contribute to statewide GHG reduction goals. Specifically, the project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and vehicle miles traveled that no longer are made. Second, it would eliminate many vehicle trips because travel to and from the project site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

As illustrated in Table 3.7-6, the project's profile as an urban infill, mixed-use project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would range from 0-20 percent in reductions from pass-by trips, up to 5 percent from internal capture of vehicle travel, and 15 percent reductions from the substantial mode share from public transit. These would result in concomitant reductions in CO<sub>2</sub>e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

**Table 3.7-6**  
**Daily Vehicle Travel Reductions Associated with Project**

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Apartments	0%	0%	15%
Retail	5%	10%	15%
Specialty Retail	5%	10%	15%
Quality Restaurant	5%	10%	15%
High Turnover Restaurant	5%	20%	15%
<i>Source: Overland Traffic Consultants, Inc., Traffic Impact Study for a Mixed-Use Project at 1500 Granville Avenue; June 2016.</i>			

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by the City's Green Building code.
- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO<sub>2</sub> estimates from mobile sources (particularly CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more

walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. Project-specific impacts related to the emission of greenhouse gases would be less than significant.

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

**Less Than Significant Impact.** The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with a number of relevant plans and policies that govern climate change.

**Consistency with Executive Orders S-03-05 and B-30-15.**

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and other transit providers.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by ARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "...for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990



levels by 2050,” as called for in ARB’s First Update to the AB 32 Scoping Plan.<sup>79,80</sup> As such, the Project’s post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

### **Consistency with the AB 32 Scoping Plan**

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. Table 3.7-7 evaluates the Project’s consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. The Project is consistent with the AB 32 Scoping Plan’s focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce the Project’s emissions level.<sup>81</sup> Additionally, further additions to California’s renewable resource portfolio would favorably influence the Project’s emissions level.<sup>82</sup>
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project’s emissions level.<sup>83</sup>
- **Water Sector:** The Project’s emissions level will be reduced as a result of further desired enhancements to water conservation technologies.<sup>84</sup>
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project’s emissions level.<sup>85</sup>

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<sup>79</sup> CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the “electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles.”]

<sup>80</sup> CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014.

<sup>81</sup> CARB, *First Update*, pp. 37-39, 85, May 2014.

<sup>82</sup> CARB, *First Update*, pp. 40-41, May 2014.

<sup>83</sup> CARB, *First Update*, pp. 55-56, May 2014.

<sup>84</sup> CARB, *First Update*, p. 65, May 2014.

<sup>85</sup> CARB, *First Update*, p. 69, May 2014.

**Table 3.7-7  
Project Consistency with AB 32 Scoping Plan  
Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b>California Cap-and-Trade Program.</b> Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	<b>Not Applicable.</b> The statewide program is not relevant to the Project.
<b>California Light-Duty Vehicle Greenhouse Gas Standards.</b> Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	<b>Not Applicable.</b> The development of standards is not relevant to the Project.
<b>Energy Efficiency.</b> Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	<b>Consistent.</b> The Project will be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, with compliance with the City's Green Building Ordinance, the Project will exceed Title 24 standards.
<b>Renewables Portfolio Standard.</b> Achieve 33 percent renewable energy mix statewide.	<b>Consistent.</b> The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
<b>Low-Carbon Fuel Standard.</b> Develop and adopt the Low Carbon Fuel Standard.	<b>Not Applicable.</b> The statewide program is not relevant to the Project.
<b>Regional Transportation-Related Greenhouse Gases.</b> Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	<b>Not Applicable.</b> The development of regional planning goals is not relevant to the Project.
<b>Vehicle Efficiency Measures.</b> Implement light-duty vehicle efficiency measures.	<b>Not Applicable.</b> State agencies are responsible for implementing efficiency measures.
<b>Goods Movement.</b> Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	<b>Not Applicable.</b> State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
<b>Million Solar Roofs Program.</b> Install 3,000 MW of solar-electric capacity under California's existing solar programs.	<b>Neutral.</b> The Project may or may not include solar roofs.
<b>Medium/Heavy-Duty Vehicles.</b> Adopt medium and heavy-duty vehicle efficiency measures.	<b>Not Applicable.</b> State agencies are responsible for implementing efficiency measures.
<b>Industrial Emissions.</b> Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	<b>Not Applicable.</b> This measure addresses industrial facilities. The Project is not an industrial facility.
<b>High Speed Rail.</b> Support implementation of a high speed rail system.	<b>Not Applicable.</b> This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.

**Table 3.7-7  
Project Consistency with AB 32 Scoping Plan  
Greenhouse Gas Emission Reduction Strategies**

<b>Strategy</b>	<b>Project Consistency</b>
<b>Green Building Strategy.</b> Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	<b>Consistent.</b> The Project will be compliant with the City's Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
<b>High Global Warming Potential Gases.</b> Adopt measures to reduce high global warming potential gases.	<b>Not Applicable.</b> State agencies are responsible for implementing these measures.
<b>Recycling and Waste.</b> Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	<b>Consistent.</b> Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
<b>Sustainable Forests.</b> Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	<b>Not Applicable.</b> Resource Agency departments are responsible for implementing this measure.
<b>Water.</b> Continue efficiency programs and use cleaner energy sources to move and treat water.	<b>Consistent.</b> The Project will be compliant with the City's Green Building Ordinance, would incorporate water saving features and energy efficient fixtures into its design.
<b>Agriculture.</b> In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	<b>Not Applicable.</b> The Project does not include agricultural facilities.
<i>Source: CAJA Environmental Services, 2016.</i>	

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

### **Consistency with SCAG's 2016-2040 RTP/SCS**

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the site's location near substantial local transit bus services

places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the site will produce substantial reductions in auto mode share to and from the site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

At least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5 percent requirement results in a fractional space, round up to the next whole number.

Table 3.7-8 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

**Table 3.7-8  
Project Consistency With SCAG 2016-2040 RTP/SCS**

<b>Actions and Strategies</b>	<b>Responsible Party(ies)</b>	<b>Consistency Analysis <sup>a</sup></b>
<b><i>Land Use Strategies</i></b>		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	<b>Consistent.</b> The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	<b>Consistent.</b> The Project would help further jobs/housing balance objectives. The project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.

**Table 3.7-8  
Project Consistency With SCAG 2016-2040 RTP/SCS**

<b>Actions and Strategies</b>	<b>Responsible Party(ies)</b>	<b>Consistency Analysis <sup>a</sup></b>
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
<b>Transportation Strategies</b>		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
<b>Technological Innovation and 21st Century Transportation</b>		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	<b>Not Applicable.</b> While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging

**Table 3.7-8**  
**Project Consistency With SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis <sup>a</sup>
		programs.
Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

### **Consistency with the City of Los Angeles ClimateLA Implementation Plan**

Construction of the Project would generally be consistent with “ClimateLA” implementation plan, including its goal of making Los Angeles a worldwide leader in green buildings. Specifically, compliance with the City’s LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (Present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions.

Construction of the Project is consistent with the “ClimateLA” plan’s goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City’s Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operations of the Project is also consistent with the “ClimateLA” focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project is consistent with the Plan’s focus on reducing emissions from private vehicle use. Specifically, the site’s infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the mixed-use nature of the Project is consistent with the Plan’s land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the Project would be consistent with “ClimateLA” and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State’s renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the

City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "ClimateLA" plan.

With regard to waste, the Project would be consistent with the "ClimateLA" goal of reducing or recycling 70 percent of trash by 2015. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with "ClimateLA" and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

### **Consistency with the City of Los Angeles Green Building Ordinance**

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Project will comply with the City of Los Angeles' Green Building Ordinance standards, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level (equivalent). Projects that are LEED certified or the equivalent generally exceed Title 24 (2013) standards by at least 10 percent.<sup>86</sup> As such, it would

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<sup>86</sup> U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396>, December 8, 2016.

incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

**1. GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

- Access to several public transportation lines. Los Angeles County Metropolitan Transportation Authority (i.e., Routes 4 and 704 on Santa Monica Boulevard, Routes 20 and 720 on Wilshire Boulevard), and Santa Monica Big Blue Bus Routes 1 and 2 on Santa Monica and Wilshire Boulevards, respectively. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

**2. GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
  - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
  - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
  - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
  - Installed tank type water heaters will have an Energy Factor higher than .6.
  - Installed tankless water heaters will have an Energy Factor higher than .80.
  - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
  - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as



per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

**3. GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
  - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
  - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.
- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.
- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:
  - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
  - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

**4. GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and

composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

**5. GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.
- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

#### **Consistency with the City of Los Angeles Mobility 2035 Plan**

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

#### **Cumulative Impacts**

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as

energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program. Currently, there are no quantitative ARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles policies (e.g., Green Building Ordinance, Mobility 2035 Plan, ClimateLA).

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. The Project is consistent with the approach outlined in ARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by ARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by ARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP. The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code). Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 22 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions. As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not

directly subject to the Cap and Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable. Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.

## 8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following reports, included as Appendix E of this IS/MND:

- E-1 Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.
  - E-2 Comprehensive Asbestos Survey Report, 11752-11776 Santa Monica Boulevard, ENV America Inc., July 3, 2014.
  - E-3 Lead Survey Report, 11752-11776 Santa Monica Boulevard, ENV America Inc., July 3, 2014.
  - E-4 Phase II Environmental Site Assessment, Northgate Environmental Management, July 6, 2016
- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.** A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less than significant.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of residential, retail and restaurant uses. These typical urban uses do not involve the routine use, transport or disposal of hazardous materials. Instead, the operation of the Project has limited hazardous materials similar to any other mixed-use urban development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Other uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. The Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those

materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with operation of the Project would also be less than significant.

The transport of hazardous materials and wastes (i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils), if they occur at all in connection with either Project construction or operations, would occur in accordance with federal and state regulations, including the Federal Resource Conservation and Recovery Act (RCRA), Title 49 of the Code of Federal Regulations (CFR), the California Vehicle Code, and the California Health and Safety Code. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, potential impacts associated with the minimal transport of any hazardous materials would also be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if a project could create an upset or accident condition involving hazardous materials.

**Records Review**

A review of standard environmental databases maintained by Federal, state, and tribal offices were searched for properties with reported environmental conditions located within approximate minimum search distances as specified by ASTM Standard E 1527-13, by using geocoding information that identified the coordinates of the properties in the databases or by checking the street addresses of practically reviewable non-geocoded "orphan" properties within the same zip code. The database report identified 13 "orphan sites." Orphan sites are those sites that could not be accurately mapped or geocoded due to inadequate location information. EBI attempted to locate these sites via vehicular reconnaissance and interviews with personnel familiar with the area. Based on this research, EBI did not identify listed orphan sites within the approximate minimum search distances that may be considered likely to have impacted conditions at the Site. Table 3.8-1 provides a summary of the findings of the environmental database report.

**Table 3.8-1**  
**Summary of Federal, State, and Tribal Agency Database Findings**

<b>Regulatory Database</b>	<b>Approximate Search Distance (miles)</b>	<b>Site Listed</b>	<b>Off-Site Listings with Search Distance</b>
Federal NPL Sites	1.0	No	0
Federal Delisted NPL Sites	0.5	No	0
Federal CERCLIS Sites	0.5	No	0
Federal CERCLIS NFRAP Site	0.5	No	0
Federal RCRA CORRACTS Sites	1.0	No	0
Federal RCRA non-CORRACTS TSD Sites	0.5	No	0
Federal RCRA Generators Sites	Property/Adjoining	Yes	1
Federal Engineering/Institutional Control	0.5	No	0
Federal ERNS Sites	Property	No	NA
CA Annual Workplan Sites (AWP)	1.0	No	0
CA High-Priority Confirmed Release Sites	1.0	No	0
CA Hazardous Waste Sites (ENVROSTOR)	1.0	No	18
CA Proposition 65 Notification Records	1.0	No	0
CA Toxic Pits Cleanup Act Sites	1.0	No	0
CA Bond Expenditure Plan	1.0	No	0
CA Hazardous Waste and Substances Sites List	0.5	No	0
CA Spill, Leaks, Investigations, and Cleanup	0.5	No	7
CA Voluntary Cleanup Program (VCP)	0.5	No	0
CA Regional Water Quality Control Board	0.5	No	13
Leaking Underground Storage Tanks (LUST)	-	-	-
CA Facility Inventory Database (FID UST)	Property/Adjoining	Yes	3
CA Hazardous Substance Storage Container Database	Property/Adjoining	No	2
CA SWEEPS	Property/Adjoining	Yes	3
CA Solid Waste Information System (SWIS)	0.5	No	1
CA Waste Management Unit Database / Solid Waste	0.5	No	0
CA Hazardous Material Incident Report System	Property	No	NA
CA Hazardous Waste Information system (HAZNET)	Property	No	NA
CA Site Mitigation Brownfield Reuse Program	0.5	No	0
Tribal Environmental Databases	1.0	No	0
EDR US Historical Auto Station	Property	Yes	NA
Sources: page 10, <i>Phase I Environmental Site Assessment</i> , EBI Consulting, October 28, 2015. Table: CAJA Environmental Services, February 2016.			

The following databases had the Site and/or an off-site listing:

### ***RCRA Hazardous Waste Generators***

Hazardous waste generators tracked under the Resource Conservation and Recovery Act (RCRA) are classified as either Large Quantity Generators (LQGs), Small Quantity Generators (SQGs), or

Conditionally Exempt Small Quantity Generators (CESQG). A RCRA-LQG is defined as a facility that generates over 1,000 kilograms (Kg) of hazardous waste, or over 1 Kg of acutely hazardous waste per month. A RCRA-SQG is defined as a facility that generates between 100 Kg and 1,000 Kg of hazardous waste per month. A RCRA-CESQG is defined as a facility that generates less than 100 Kg of hazardous waste, or less than 1 Kg of acutely hazardous waste per month. The Project Site and one adjoining property was identified on the RCRA Generator database. The information on the listings:

- 11750 Santa Monica (Buerge Jeep Eagle), Project Site, EPA ID No. CAD983671082 – No reported violations.
- 11800 Santa Monica (Walker Buerge Ford), Adjacent to the east, EPA ID No. CAD028621944 – No reported violations.

Based upon the absence of reported violations and/or distance/presumed hydrogeologic gradient relative to the Site, it is considered unlikely that conditions associated with the identified RCRA Generator Walker Buerge Ford facility represent an environmental concern to the Site. One former occupant of the Site, Buerge Jeep Eagle, was listed RCRA-SQG of hazardous waste. Buerge Jeep Eagle occupied the Project Site buildings from circa 1991 until 2008. This facility is currently vacant. Based upon information presented in the environmental database report, Buerge Jeep Eagle formerly generated between 100 Kg and 1,000 Kg of hazardous waste per month of non-reported waste. No RCRA violations were reported for Buerge Jeep Eagle. Based upon the absence of reported violations associated with this listing, the former RCRA-SQG database listing for Buerge Jeep Eagle is not considered to represent an existing release, past release, or material threat of release of hazardous substances or petroleum products on the Site.

### ***California Hazardous Waste Sites (ENVIROSTOR)***

The California Hazardous Waste Sites (ENVIROSTOR) database contains potential or confirmed hazardous substance release sites, or sites for which there may be reasons to investigate further, identified by the California DTSC. The database includes the following site types: Federal NPL; State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. The Project Site was not identified on the ENVIROSTOR database. However, 18 sites located within 1.0 mile of the Project Site were identified on the ENVIROSTOR database. Of these sites, 17 are located more than 0.60 miles from the Project Site. Based on distance from the Project Site, these 17 ENVIROSTOR sites are not anticipated to impact the environmental integrity of the Site. Information regarding the remaining listed site is shown in Table 3.8-2. Based upon the distance/presumed hydrogeologic gradient relative to the Project Site and/or reported nature/extent of contamination, it is considered unlikely that conditions associated with the identified ENVIROSTOR site represents an environmental concern to the Project Site.

**Table 3.8-2**  
**ENVIROSTOR**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
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**Table 3.8-2**  
**ENVIROSTOR**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
12210 ½ Nebraska Avenue Property 12210 ½ Nebraska Avenue, Los Angeles, California	0.519 miles / South / Down-gradient	60001101	Notification Date: 12/07/2009 Contaminants: TCE Media Impacted: Soil Status: Refer to Regional Water Quality Control Board Date of Closure: NA

*Presumed hydrogeologic gradient based upon regional topography.*

*Sources: page 14, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.*

*Table: CAJA Environmental Services, February 2016.*

### ***Spill, Leaks, Investigations, and Cleanup (SLIC)***

The Spills, Leaks, Investigations, and Cleanups (SLIC) database, maintained by the California Water Resources Control Board, includes unauthorized discharges from spills and leaks, other than from underground storage tanks or other regulated sites. The Project Site was not identified on the SLIC database. However, seven sites located within 0.5 mile of the Project Site were identified on the SLIC database. Of these sites, four are located more than 0.25 miles from the Project Site. Based on distance from the Project Site, these four SLIC sites are not anticipated to impact the environmental integrity of the Project Site. Information regarding the remaining three listed sites is presented in the Table 3.8-3. Based upon the current regulatory status and/or distance/presumed hydrogeologic gradient relative to the Project Site, it is considered unlikely that conditions associated with the identified SLIC sites represent an environmental concern to the Project Site.

**Table 3.8-3**  
**SLIC**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
Barrington Plaza - Vons 11674 Santa Monica Los Angeles, California	0.139 miles / East / Crossgradient	1106	Notification Date: Not reported Contaminants: PCE Media Impacted: Not reported Status: Not reported Date of Closure: NA
Barrington Plaza - Vons 11674 Santa Monica Boulevard West Los Angeles, California	0.139 miles / East / Crossgradient	SL0603792739	Notification Date: 10/23/2002 Contaminants: PCE per NFA report at Geotracker Media Impacted: GW Status: Case Closed Date of Closure: 12/10/2012
The Cleaning Store 11628 Santa Monica Los Angeles, California	0.166 miles / East-northeast / Crossgradient	SLT43618616	Notification Date: 05/12/1998 Contaminants: VOCs Media Impacted: Not reported Status: Case Closed

**Table 3.8-3**  
**SLIC**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
			Date of Closure: 05/13/1998
<i>Presumed hydrogeologic gradient based upon regional topography.</i> <i>Sources: page 15, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.</i> <i>Table: CAJA Environmental Services, February 2016.</i>			

***Regional Water Quality Control Board (RWQCB) – Leaking Underground Storage Tanks (LUST)***

The Regional Water Quality Control Board (RWQCB) maintains a database of reported Leaking Underground Storage Tank (LUST) Sites. The Project Site was not identified on the RWQCB – LUST database. However, 13 sites located within 0.5 mile of the Project Site were identified on the RWQCB – LUST database. Of these sites, nine are located more than 0.25 miles from the Project Site. Based on distance from the Project Site, these nine LUST sites are not anticipated to impact the environmental integrity of the Project Site. Information regarding the remaining four listed LUST sites is presented in the Table 3.8-4. Based upon the current regulatory status and distance/presumed hydrogeologic gradient relative to the Project Site, it is considered unlikely that conditions associated with the identified LUST sites represent an environmental concern to the Project Site.

**Table 3.8-4**  
**RWQCB - LUST**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
West L.A. Shell 11574 Santa Monica Boulevard Sawtelle, California	0.212 miles / East-northeast / Crossgradient	T0603700699	Notification Date: 06/21/1990 Contaminants: Gasoline Media Impacted: Soil Status: Case closed Date of Closure: 02/28/1995
76 Product Station #5210 11954 Santa Monica Boulevard Sawtelle, California	0.223 miles / West-southwest Crossgradient	T0603700695	Notification Date: 04/29/1988 Contaminants: Gasoline Media Impacted: GW Status: Case closed Date of Closure: 03/31/1997
Equilon Enterprises 11574 Santa Monica Los Angeles, California	0.231 miles / East-northeast / Crossgradient	T0603784772	Notification Date: 11/11/2002 Contaminants: Other solvent or Nonpetroleum hydrocarbon Media Impacted: GW Status: Case closed Date of Closure: 03/01/2004
Shell Service Station 11574 Santa Monica Los Angeles, California	0.231 miles / East-northeast / Crossgradient	900250143A	Notification Date: 11/11/2002 Contaminants: Hydrocarbons Media Impacted: GW Status: Case closed Date of Closure: 03/01/2004

**Table 3.8-4**  
**RWQCB - LUST**

Site	Distance / Direction / Gradient	ID No.	Regulatory Status
<i>Presumed hydrogeologic gradient based upon regional topography.</i> <i>Sources: page 16, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.</i> <i>Table: CAJA Environmental Services, February 2016.</i>			

**Facility Inventory Database (FID UST)**

The California Environmental Protection Agency maintains a Facility Inventory Database (FID), which contains a historical registry of active and inactive underground storage tank (UST) locations reported by the California Water Resource Control Board. The Project Site and three adjoining property was properties were identified on the FID UST database. Information regarding the listed sites is presented in Table 3.8-5. Review of readily available historical sources revealed that the northwestern portion of the Project Site was historically used as a gasoline station from the 1920s to 1950s. No information regarding the removal of the USTs associated with the former gas station was made available to or discovered during this project with the exception of those discussed in USTs. The eastern portion of the Project Site was used an auto repair shop since 1938, and the remaining portions of the site were utilized as an auto dealership with auto repair shops from 1953 to late 2000s. No information concerning the location, status, and or removal of UST(s) that may have been associated with the former auto dealership/repair facility were made available to or discovered during this project with the exception of those discussed USTs below. The UST listing for the Project Site does not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address. The UST(s) status is listed as “Active”; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site as well as the absence of UST removal/investigation reports is a recognized environmental condition (REC).

Based upon the absence of reported releases and/or distance/presumed hydrogeologic gradient relative to the Project Site, it is considered unlikely that conditions associated with the identified Shawbridge, Walker Buerge Ford, and LA City Department of General Services FID UST sites represent an environmental concern to the Project Site. As such, it is considered that these historical activities represents a current environmental concern to the Project Site.

**Table 3.8-5**  
**FID UST**

Location	Distance / Direction / Gradient	Capacity / Contents	Year Installed	Status
Walker Motor Co. 11752 Santa Monica Boulevard Los Angeles, California	Project Site	Not reported	Not reported	Active
Walker Buerge Ford 11800 Santa Monica Boulevard	Adjacent / West / Crossgradient	Not reported	Not reported	Active

**Table 3.8-5**  
**FID UST**

Location	Distance / Direction / Gradient	Capacity / Contents	Year Installed	Status
Los Angeles, California				
LA City Dept of General Services 1479 Stoner Avenue Los Angeles, California	Adjacent / North / Upgradient	Not reported	Not reported	Active
Shawbridge Inc. 11726 Santa Monica Boulevard Los Angeles, California	Adjacent / East / Crossgradient	Not reported	Not reported	Inactive
<i>Presumed hydrogeologic gradient based upon regional topography.</i> <i>Sources: page 16, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.</i> <i>Table: CAJA Environmental Services, February 2016.</i>				

### ***Hazardous Substance Storage Container Database (HIST UST)***

The Hazardous Substance Storage Container Database is a historical listing of UST sites maintained by the California Water Resources Control Board. The Project Site was not identified on the HIST UST database. However, two adjoining properties were identified on the HIST UST database. Information regarding the listed sites is presented in Table 3.8-6. Based upon the absence of reported releases and/or distance/presumed hydrogeologic gradient relative to the Project Site, it is considered unlikely that conditions associated with the identified the HIST UST sites represent an environmental concern to the Project Site.

**Table 3.8-6**  
**Hist UST**

Location	Distance / Direction / Gradient	Capacity / Contents	Year Installed	Status
Walker Buerge Ford 11800 Santa Monica Boulevard Los Angeles, California	Adjacent / West / Crossgradient	(5) Not reported capacity UST / Waste Oil (1) 7,500-gallon UST Unleaded	1958 1959 1967 1972 Not reported	Not reported
Palisades Street Maintenance Yard 1479 Stoner Avenue Los Angeles, California	Adjacent / North / Upgradient	(2) 1,000- gallon USTs / Diesel (1) 550- gallon UST / Diesel Fuel (1) 2,000- gallon UST / Waste Oil	Not reported Not reported Not reported	Not reported Not reported Not reported
<i>Presumed hydrogeologic gradient based upon regional topography.</i> <i>Sources: page 18, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015.</i> <i>Table: CAJA Environmental Services, February 2016.</i>				

**Statewide Environmental Evaluation and Planning System (SWEEPS)**

The Statewide Environmental Evaluation and Planning System (SWEEPS) is an underground storage tank database that was updated and maintained by a company contacted by the State Water Resource Control Board in the early 1980s. The listing no longer updated or maintained. The Project Site and three adjoining properties were identified on the SWEEPS database. Information regarding the listed sites is presented in Table 3.8-7. Review of readily available historical sources revealed that the northwestern portion of the Project Site was historically used as a gasoline station from the 1920s to 1950s. No information regarding the removal of the USTs associated with the former gas station was made available to or discovered during this project with the exception of those discussed in USTs. The eastern portion of the Project Site was used an auto repair shop since 1938, and the remaining portions of the site were utilized as an auto dealership with auto repair shops from 1953 to late 2000s.

The UST listing for the Project Site does not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address. The UST(s) status is listed as “Active”; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site as well as the absence of UST removal/investigation reports is a recognized environmental condition (REC).

Based upon the absence of reported releases and/or distance/presumed hydrogeologic gradient relative to the Project Site, it is considered unlikely that conditions associated with the identified Shawbridge, Walker Buerge Ford, and LA City Department of General Services SWEEPS sites represent an environmental concern to the Project Site.

**Table 3.8-7**  
**SWEEPS**

<b>Location</b>	<b>Distance / Direction / Gradient</b>	<b>Capacity / Contents</b>	<b>Year Installed</b>	<b>Status</b>
Walker Motor Co. 11752 Santa Monica Boulevard Los Angeles, California	Project Site	Not reported	Not reported	Active
Shawbridge Inc. 11726 Santa Monica Boulevard Los Angeles, California	Adjacent / East / Crossgradient	Not reported	Not reported	Not reported
Walker Buerge Ford Active 11800 Santa Monica Boulevard Los Angeles, California	Adjacent / West / Crossgradient	(5) Not reported capacity UST / Waste Oil, Unknown Content (1) 7,500-gallon UST Unleaded	Not reported Not reported	Active Active
LA City Dept of General Services 1479 Stoner Avenue Los Angeles, California	Adjacent / North / Upgradient	(2) 1,000- gallon USTs / Diesel (1) 550- gallon UST / Diesel (1) 2,000- gallon UST / Unknown	Not reported Not reported Not reported	Active Active Active

**Table 3.8-7  
SWEEPS**

Location	Distance / Direction / Gradient	Capacity / Contents	Year Installed	Status
<i>Presumed hydrogeologic gradient based upon regional topography. Sources: page 18, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015. Table: CAJA Environmental Services, February 2016.</i>				

### ***Solid Waste Information System (SWIS)***

Solid Waste Information System (SWIS) records typically contain an inventory of solid waste facilities or landfills identified by the Integrated Waste Management Board. These may be active or inactive facilities or open dumps that failed to meet RCRA Section 4004 criteria for solid waste landfills or disposal sites. The Project Site was not identified on the SWIS database. However, one site located within 0.5 mile of the Project Site was identified on the SWIS database. Information regarding the listed site is presented in Table 3.8-8. Based upon the absence of reported violations and type of operation, it is considered unlikely that conditions associated with the identified site represent an environmental concern to the Project Site.

**Table 3.8-8  
SWIS**

Location	Distance / Direction / Gradient	ID No.	Facility Status
Palisades Street MDY 1479 Stoner Avenue Los Angeles, California	Adjacent/ North-northeast/ Upgradient	19-AA-0810	Facility Type: Transfer Station / Limited Volume Facility Status: Active No Reported Violations
<i>Presumed hydrogeologic gradient based upon regional topography. Sources: page 19, Phase I Environmental Site Assessment, EBI Consulting, October 28, 2015. Table: CAJA Environmental Services, February 2016.</i>			

### ***Historical Auto Station Sites***

EDR searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to, gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records" (HRHR). EDR's effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches. The Project Site address was twice identified on the EDR US Historical Auto Stations Sites database. It is noted that the "Owens FC" listing was addressed to Santa Monica, California, which, based

on its location, is not located on the Project Site. The remaining Project Site listing is addressed to Sawtelle, California, which is the “neighborhood name” for the Project Site area. Information regarding the listed site is presented in Table 3.8-9. The listing for the Project Site in the EDR Historical Auto Station Sites database indicated that a gasoline service station was present at the Project Site in 1928. Review of readily available historical sources revealed that the northwestern portion of the Project Site was historically used as a gasoline station from the 1920s to 1950s. No information regarding the removal of the USTs associated with the former gas station was made available to or discovered during this project with the exception of those reviewed in USTs. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site as well as the absence of UST removal/investigation reports is a recognized environmental condition (REC).

**Table 3.8-9  
SEDR US Historical Auto Station Sites**

<b>Location</b>	<b>Distance / Direction / Gradient</b>	<b>ID No.</b>	<b>Facility Status</b>
Scheerer H F 11776 Santa Monica Sawtelle, CA	Project Site	NA	1928 – Gas and Oil Service Stations
<i>Presumed hydrogeologic gradient based upon regional topography. Sources: page 21, <u>Phase I Environmental Site Assessment</u>, EBI Consulting, October 28, 2015. Table: CAJA Environmental Services, February 2016.</i>			

## **Underground Storage Tanks (USTs)**

### ***Existing Storage Tanks***

EBI did not observed evidence of active USTs or ASTs at the Project Site. The UST database listings for the Project Site do not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address. The UST(s) status on the databases is listed as “Active”; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site is a recognized environmental condition (REC).

### ***Former Storage Tanks***

The northwestern portion of the Project Site was used as a gasoline station from 1920s to 1950s. The eastern portion of the Project Site was used an auto repair shop since 1938 and the remaining portions of the site were utilized as auto dealership with auto repair shops from 1953 to late 2000s. EBI reviewed a prior environmental report that was performed for the adjoining property to the southwest. The review of the Phase I Environmental Site Assessment (TOR, 2014) revealed that TOR reviewed records of the LA Fire Department for the adjoining facility as well as additional records for the current Project Site. The reviewed records indicated the following:

- 11776 Santa Monica Boulevard

The LAFD file consisted of one tank abandonment form and two tank registration forms.

- 8 December 1952 – Tank Abandonment Form: This form indicates that three 550-gallon USTs were crushed, ventilated, and removed from the 11776 Santa Monica Boulevard parcel and disposed at Peterson and Brodine Yard at 201 N. Mission Road.
- 8 January 1953 – Transfer of Permit for Auto Filling Station: This form indicates that two 3,000-gallon gasoline USTs and one existing 550-gallon used oil UST were associated with Jim’s Service at 11776 Santa Monica Boulevard. Two 3,000-gallon gasoline USTs were installed 4 and 12 feet from the west property line and 30 feet from the north property line. One 550-gallon used oil UST was already onsite 4 feet from the west property line and 5 feet from the north property line. Three fuel dispensers were associated with the two fuel USTs 15, 18 and 31 feet from the west property line and 15 feet from the north property line.

Additional records for 11800 Santa Monica Boulevard also indicated that one waste oil UST was removed from 11776 Santa Monica Boulevard.

- 25 September 1996. Toxiguard Systems, Inc. (TSI). Tank Removal Closure Report, 11800 Santa Monica Boulevard, West Los Angeles, California. This report indicates that a 280-gallon waste oil UST was excavated and removed from the site on 12 September 1996. No obvious holes, cracks or corrosion was noted on the tank, and no impact to the soils was noted at the time of tank removal. The illustration depicting the location of the UST revealed that the historical location of the UST was at the current Project Site (11776 Santa Monica Boulevard).

The records indicated that the UST was removed and soil samples were collected. Laboratory analysis of the soil samples collected following removal of the UST indicated the following contaminants of concern:

- Sample T2-#1 (beneath the UST): 690 mg/Kg TRPH, No detectable BTEX, 40 mg/Kg Lead;
- Sample WSP-#2 (stockpile): 490 mg/Kg TRPH, No detectable BTEX, 31 mg/Kg;
- Sample ESP-#3 (stockpile): 250 mg/Kg TRPH, No detectable BTEX, 30 mg/Kg; and
- Sample 20’ WW#4 (background): 2,950 mg/Kg TRPH, No detectable BTEX, 8.4 mg/Kg Lead.

On November 18 1996, the LAFD UST division issued a “No Further Action” determination for the removed 280-gallon waste oil UST, based on the September 25, 1996, report of removal. It should be noted that copies of the LAFD records were not appended to the prior report and were not actually reviewed by EBI. TOR concluded that this former waste oil UST was a historical recognized environmental condition (HREC). While it appears from the soil sampling results that a release is not associated with this waste oil UST, EBI has not performed a review of the actual removal report and therefore cannot conclude that this UST is not a recognized environmental condition (REC). Based on a



review of this prior report (TOR, 2014), one waste oil UST was removed from the Project Site with associated soil sampling and analysis. Additionally, three 550-gallon USTs were also removed from the Project Site; however, removal reports and/or subsurface investigation reports were not made available for review. The UST database listings for the Project Site do not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address; therefore the number of USTs that might remain at the Project Site is unknown. The UST(s) status is listed as “Active” on the database entries; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site along with the absence of UST removal documentation is a recognized environmental condition (REC).

During the Phase II analysis, electromagnetic (EM) and ground penetrating radar (GPR) was used to determine geologic layering, metallic and nonmetallic utilities, underground storage tanks, excavations, and voids and cavities beneath roads or concrete walls. The EM and GPR found anomalies that could indicate a small UST or buried metal. In addition, due to limitations with the EM and GPR, USTs could still be buried. The removal of USTs will be conducted according to the regulations of the Los Angeles City Fire Department Underground Storage Tank Division.

#### ***Oil-Containing Equipment And Polychlorinated Biphenyls (PCBs)***

Polychlorinated biphenyls (PCBs) are a chemical component of many dielectric fluids, heat transfer fluids, hydraulic fluids, lubricating oils, paints, or coatings manufactured prior to July 2, 1979. Equipment that may potentially contain PCBs includes electrical equipment such as transformers or capacitors or hydraulically operated equipment, such as elevators, compaction equipment, or manufacturing equipment. The manufacture and distribution in commerce of PCBs was banned for use in 1979 by the United States Congress, which enacted the Toxic Substance and Control Act (TSCA). In accordance with US Code of Federal Regulations Title 40 - Protection of Environment, Chapter 1 - Environmental Protection Agency, Subchapter R - Toxic Substance Control Act (TSCA), Part 761 - Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions, the owner of a transformer or other PCB-containing equipment is responsible for equipment maintenance and remediation in the event of a leak or release. Based upon the absence of transformers, no potential PCB-containing equipment was identified at the Project Site. The vacant building (former auto dealership and automobile repair facility) contains 22 service bays and is currently equipped with 12 underground hydraulic lifts. Since the lifts appear to be original (circa 1953 and 1973), the hydraulic fluid contained within this hydraulic equipment may potentially contain PCBs. The hydraulic fluid reservoirs are located beneath the concrete floor of the service bays and are currently inaccessible. EBI additionally observed a patched area in the concrete floor of the fourth service bay, which appears to indicate the location of a former underground hydraulic lift. It should be noted that three lifts appear to be inoperable due abandonment. Based on the unknown condition of the former hydraulic lift at the time of removal and the unknown condition of the remaining existing hydraulic lifts, which are assumed approximately 43 years old, the potential exists that the underground hydraulic lift systems had impacted subsurface conditions at the Project Site. This is currently considered a recognized environmental condition (REC).

## Historic Materials of Concern

### *Suspect Asbestos-Containing Materials*

The onsite structures were initially constructed before 1979. Due to their age, there is a potential for asbestos-containing materials (ACM) to be present.<sup>87</sup> An asbestos survey was prepared in July 2014. Table 3.8-10, Asbestos Survey, lists the material type, percent asbestos, and friability for each confirmed and assumed ACM identified in the Project Site's existing buildings. Bulk sampling and laboratory analysis indicated that ACM are present in the buildings. The identified or assumed ACM are required to be removed by a California Licensed Asbestos Abatement Contractor prior to demolition. The following federal, state, and local regulations require that any identified ACM that will be disturbed by renovation activities shall be removed from the building prior to demolition or renovation and that written notification be provided to contractors and other effected parties.

1. The Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) for building demolition and renovation applies to facilities that contain more than 260 linear feet or 160 square feet and requires that asbestos-containing building materials be removed prior to demolition or renovation.
2. The California Health and Safety Code Chapter 10.4 requires that any owner of a commercial or industrial building provide written notice to their employees, tenants and contractors about the presence of asbestos in the building within 15 days of receipt of such knowledge. Any contractor that receives such notice is required to provide a copy to each of its employees.
3. South Coast Air Quality Management District Rule 1403 requires written notification 10 working days prior to the demolition of any structure and that all friable and non-friable asbestos-containing building materials be removed prior to demolition by a State of California licensed Asbestos Abatement Contractor.<sup>88</sup>

Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, with compliance with the federal (NESHAP), state (California Health Code Chapter 10.4), and local regulations (SCAQMD Rule 1403) for ACM (see the regulatory compliance measure), the impact would be less than significant.

**Table 3.8-10**  
**Asbestos Survey**

Material Type	Percent Asbestos	Friable
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<sup>87</sup> Page 37, *Phase I Environmental Site Assessment*, EBI Consulting, October 28, 2015.

<sup>88</sup> *Comprehensive Asbestos Survey Report*, ENV America Inc., July 3, 2014.

**Table 3.8-10  
Asbestos Survey**

<b>Material Type</b>	<b>Percent Asbestos</b>	<b>Friable</b>
<b>Building 1</b>		
Drywall #1 (South Section)	Drywall - None Detected Compound – 2% Chrysotile	No
12” White Floor Tile / Mastic	Tile – None Detected Mastic – 2% Chrysotile	No
12” Grey Floor Tile / Mastic	Tile – None Detected Mastic – 2% Chrysotile	No
Grey Base Cove / Mastic	Base Cove – None Detected Mastic – Trace Anthophyllite	No
Rough Plaster	Trace Chrysotile	No
Roof Mastic	5% Chrysotile	No
<b>Building 2</b>		
Roof Mastic	Assumed (visual observation)	No
<b>Building 3</b>		
Parapet Cap Sheet (West Roof)	21% Chrysotile	No
Roof Mastic	5% Chrysotile	No
Transite Pipe	Assumed ACM	No
<i>A map of the buildings on the Site is included in the Asbestos Survey.  Source: Pages 2 and 3, <u>Comprehensive Asbestos Survey Report</u>, ENV America Inc., July 3, 2014.  Table: CAJA Environmental Services, February 2016.</i>		

### ***Lead-based Paint***

The onsite structures in the northern half were initially constructed before 1978. Due to their age, there is a potential for lead-based paint to be present.<sup>89</sup> A lead survey was prepared in July 2014. Table 3.8-11, Lead Survey, lists the component, paint color, substrate, and XRF reading (Innov-X X-Ray Fluorescence Spectrum Analyzer is used to perform the lead testing) for each lead based paint/material identified in the building on the Site. A total of 103 representative test readings were taken from the structures. XRF results revealed the presence of lead in quantities greater than or equal to 0.7 mg/cm<sup>2</sup> in 15 of the tests.<sup>90</sup> Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. The following survey recommendations would apply to the Project:

- Prior to demolition activities, a review of building components known to contain lead-based paint shall be assessed to confirm if they remain intact. If the lead-based painted components will be

<sup>89</sup> Page 38, *Phase I Environmental Site Assessment*, EBI Consulting, October 28, 2015.

<sup>90</sup> Pages 1, 6, *Lead Survey Report*, ENV America Inc., July 3, 2014.

removed, waste characterization testing shall be performed to determine if the components are required to be disposed of as hazardous waste.

- If the waste characterization indicates that any components are not hazardous waste, these components may be disposed of as construction debris as long as the paint is maintained in good and tightly adhered condition. However, if the demolition or renovation activities require sanding, grinding, or torch cutting of these paints, then the lead-based paint is required to be removed prior to these activities.
- All contractors shall be informed of all locations of lead-based paint, whether in good or poor condition, prior to the start of any work within the interior or exterior of the building.

**Table 3.8-11**

**Lead Survey**

Component	Color	Substrate	XRF Reading (mg/cm <sup>2</sup> )
<b>Building 1</b>			
Sink	White	Porcelain	0.7 – 3.39
Wall Tile	White	Ceramic	5
Corner Guard	Red	Meta	1.71
Counter Tile	White	Ceramic	5
Wall Tile	Yellow	Ceramic	4.86
Wall Tile	Brown	Ceramic	5
Floor Tile	Tan	Ceramic	0.7
Floor Tile	White	Ceramic	5
Toilet	White	Porcelain	0.7
<b>Building 2</b>			
No lead based paints were identified in Building 2			
<b>Building 3</b>			
Corner Guard	Red	Metal	1.07
Source: Pages 1 and 2, <i>Lead Survey Report</i> , ENV America Inc., July 3, 2014. Table: CAJA Environmental Services, February 2016.			

### **PCB Equipment**

Polychlorinated biphenyls (PCBs) were historically used as coolants and lubricants in transformers, capacitors, and other electrical equipment beginning in 1929 because they do not burn easily and serve as a good insulating material. Due to the age of the onsite structures, there is the potential that fluorescent light ballasts in fixtures contain PCBs. The ballasts do not represent a REC, but should be handled in accordance with applicable regulations upon demolition or renovation. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, with the regulatory compliance measure listed below, these impacts are less than significant:

### **Radon**

The EPA Map of Radon Zones indicates that Los Angeles County is located within a Zone 2 radon area. Zone 2 is defined as an area that has a moderate potential for radon gas, with a predicted average indoor radon screening level between 2.0 picoCuries per liter (pCi/L) and 4.0 pCi/L. The EPA recommended Action Level for radon is 4.0 pCi/L. This information is not specific to the Project Site and site specific testing would be required to evaluate any risk from radon. If radon is tested above the threshold, it will be made compliant with federal, state, and local regulations for radon. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants.

**Los Angeles City Methane Buffer Zone:** The Project Site is not located within a “Methane Buffer Zone” as defined by Los Angeles City Ordinance No. 175790.<sup>91</sup>

### **Conclusion of the Phase I ESA**

EBI has performed this Phase I Environmental Site Assessment of the Project Site in conformance with the scope and limitations of ASTM Standard E 1527-13. This assessment has identified no evidence of recognized environmental conditions (RECs) in connection with the Project Site, with the exception of the following:

- Review of readily available historical sources revealed that the northwestern portion of the Project Site was historically used as a gasoline station from the 1920s to 1950s. No information regarding the removal of the USTs associated with the former gas station was made available to or discovered during this project with the exception of those discussed in USTs. The eastern portion of the Project Site was used as an auto repair shop since 1938 and the remaining portions of the site were utilized as an auto dealership with auto repair shops from 1953 to late 2000s. No information concerning the location, status, and or removal of UST(s) that may have been associated with the former auto dealership/repair facility were made available to or discovered during this project with the exception of those discussed in USTs. The UST listing for the Project Site does not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address. The UST(s) status is listed as “Active”; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site as well as the absence of UST removal/investigation reports is a recognized environmental condition (REC) with the potential for vapor migration.
- The vacant building (former auto dealership and automobile repair facility) contains 22 service bays and is currently equipped with 12 underground hydraulic lifts. Since the lifts appear to be original (circa 1953 and 1973), the hydraulic fluid contained within this hydraulic equipment may potentially contain PCBs. The hydraulic fluid reservoirs are located beneath the concrete floor of the service bays

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<sup>91</sup> ZIMAS search for 11752 Santa Monica Boulevard, website: <http://zimas.lacity.org/>.

and are currently inaccessible. EBI additionally observed a patched area in the concrete floor of the fourth service bay, which appears to indicate the location of a former underground hydraulic lift. It should be noted that three lifts appear to be inoperable due abandonment. Based on the unknown condition of the former hydraulic lift at the time of removal and the unknown condition of the remaining existing hydraulic lifts, which are assumed approximately 43 years old, the potential exists that the underground hydraulic lift systems had impacted subsurface conditions at the Project Site. This is currently considered a recognized environmental condition (REC).

- Former floor drains located on the southwestern repair bay was observed to be clogged with dark colored material. This material appeared to be the evidence of previous discharge of hazardous substances or petroleum products to the floor drain. The service area floor drain system discharges to an oil-water separator, prior to discharge to the municipal stormwater sewerage system operated by the City of Los Angeles. The oil-water separator is located beneath the paved area in the northwest and southwest bays and is accessed by a steel manhole cover. The construction details of the on-site oil-water separator are not known. The facility is currently vacant and proposed to be demolished for new mixed-use commercial-residential development and it is unknown if the oil-water separator was regularly maintained and/or if it is currently empty. The historical operation of an oil-water separator and the observed condition of the drain associated with the system at the Project Site is a recognized environmental condition (REC) with the potential for vapor migration.

However, the following historical recognized environmental conditions (HRECs), de minimis conditions, and conditions outside the scope of ASTM Practice E 1527-13 were identified:

- Based on a review of this prior report (TOR, 2014), one waste oil UST was removed from the Project Site with associated soil sampling and analysis. Additionally, three 550-gallon USTs were also removed from the Project Site; however, removal reports and/or subsurface investigation reports were not made available for review. The UST database listings for the Project Site do not indicate the number, capacity, contents, and/or details of the UST(s) that are associated with the Project Site address; therefore the number of USTs that might remain at the Project Site is unknown. The UST(s) status is listed as “Active” on the database entries; however, active UST(s) were not observed at the Project Site. It is noted that there are no reported releases associated with the Project Site address; however, the unknown number, location, and status of UST(s) associated with the Project Site along with the absence of UST removal documentation is a recognized environmental condition (REC).
- EBI identified surficial oil staining on the concrete floor of the south bay. No cracks, penetrations, or other potential pathways to the subsurface were observed in proximity to the identified staining. This condition is not generally subject to enforcement action if known by a governing agency and is considered a de minimis condition.
- EBI reviewed a previous Comprehensive Asbestos Survey Report for the property. The report indicated that the following materials contained asbestos: joint compound, floor tile mastic, base cove mastic, rough plaster, roof mastic, parapet cap sheet, and assumed transite pipe. These identified

asbestos containing materials are reportedly be removed prior to the demolition of the building for the mixed-used commercial-residential development of the Property. Asbestos is a condition outside the scope of ASTM E 1527-13 and is not considered a recognized environmental condition (REC).

### **Recommendation**

- EBI recommends that a geophysical survey, including a ground penetrating radar (GPR) survey and/or magnetometer survey, be conducted in order to determine whether any underground storage tank (UST) systems associated with the former on-site gasoline service station and former auto dealership remain at the Project Site. EBI additionally recommends that a limited subsurface investigation be conducted, in order to characterize subsurface soil and/or groundwater conditions at the Project Site including those that are associated with the underground hydraulic lifts and oil-water separator.
- EBI recommends the identified asbestos-containing materials be removed by a licensed abatement contractor prior to renovation or demolition activities that would disturb these materials.

### **Phase II**

The primary objective of the Phase II ESA was to assess the potential presence of soil and soil vapor quality impacts related to the gasoline station at the Site and the long-term historic automobile repair operations at and in the immediate vicinity of the Site. The scope of work included the following:

- A geophysical investigation to identify underground features such as underground storage tanks (USTs), pits, sumps, clarifiers, or drains;
- A Site walk to mark the proposed boring locations and notification to Underground Service Alert (USA) for underground utility clearance;
- Preparation of a Site-specific Health and Safety Plan (HASP);
- Advancement of eight borings ranging from 5 to 25 feet below ground surface (bgs), with collection of soil samples at approximate depths of 5, 10, 15, 20, and 25 feet bgs;
- Analysis of 11 selected soil samples for volatile organic compound (VOC) analysis, 8 selected soil samples for total petroleum hydrocarbon gasoline/diesel (TPH-g/d) analysis, and 13 selected soil samples for total petroleum hydrocarbons carbon-chain (TPH-cc); and
- Installation of two temporary soil vapor sample probes at 15 and 25 feet bgs in two borings and analysis of two soil vapor samples for VOCs.

### **Conclusion**

The investigation consisted of the analysis of 19 soil samples and two soil vapor samples collected from eight borings adjacent to areas of the Site where EBI's Phase I ESA indicated possible impacts from historic Site operations.

- TPH-g, TPH-g, and VOCs were not detected above laboratory MRLs in any of the 19 soil samples analyzed. TPH-mo was detected in only one soil sample at a level three orders of magnitude below the RWQCB SSL.
- A range of low-level VOCs were detected in both soil vapor samples. None of the measured values exceeded the calculated EPA Region 9 RSLs or the DTSC SLs for soil vapor for residential or commercial/industrial land use.

Based on the results of the investigation, no further investigation is recommended.

The Project would comply with the following regulatory compliance measures. Therefore, impacts would be less than significant.

### ***Regulatory Compliance Measures***

#### **RCM-8-1      Explosion/Release (Existing Toxic/Hazardous Construction Materials)**

**Asbestos:** Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

**Lead Paint:** Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

**Polychlorinated Biphenyl – Commercial and Industrial Buildings:** Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

**Radon:** Prior to demolition activities, specific testing would be required to evaluate any risk from radon. If radon is tested above the threshold, it shall be made compliant with federal, state, and local regulations for radon.



**Removal of Underground Storage Tanks:** If any Underground Storage Tanks are discovered during excavation, they shall be decommissioned or removed as determined by the Los Angeles City Fire Department Underground Storage Tank Division. If any contamination is found, further remediation measures shall be developed with the assistance of the Los Angeles City Fire Department and other appropriate State agencies. Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) shall be submitted to the decision maker.

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

**Less Than Significant Impact.** A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,325 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is in close proximity to the following schools:<sup>92</sup>

- University High School, located at 11800 Texas Avenue, approximately 270 feet north.
- Brockton Avenue Elementary, 1309 Armacost Avenue, approximately 1,300 feet northwest.
- Saint Sebastian School, 1430 Federal Avenue, approximately 1,300 feet northeast

However, the Project will have a less than significant impact during construction (with regulatory compliance measures for lead-based paint, PCBs, UST) and will only emit minimal and common hazardous substances (such as cleaning solvents) during operations. These emissions would be small-scale, temporary, and entirely within the Site. The Project would remove and ensure that demolition of the existing structure does not emit hazardous materials. The schools would still be shielded from the Project Site by intervening residential and commercial buildings to the north. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

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

**Less Than Significant Impact.** California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the

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<sup>92</sup> *Navigate LA, Schools and Districts Layer: <http://navigatela.lacity.org/>*

above referenced lists and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. The Project Site was not listed on any of the following databases that were researched:<sup>93</sup>

- Federal National Priorities List (NPL) within a 1-mile radius;
- Federal Delisted NPL Sites within 0.5-mile radius;
- Federal CERCLIS Sites within 0.5-mile radius;
- Federal CERCLIS NFRAP Sites within 0.5-mile radius;
- Federal RCRA CORRACTS Sites within 1-mile radius;
- Federal RCRA Non-CORRACTS TSD within 0.5-mile radius;
- Federal Engineering / Institutional Sites within 0.5-mile radius;
- Federal ERNS at the Project Site;
- CA Annual Workplace Sites (AWP) within 1-mile radius;
- CA High-Priority Confirmed Release Sites (RESPONSE) within 1-mile radius;
- CA Hazardous Waste Sites (ENVIROSTOR) within 1-mile radius;
- CA Proposition 65 Notification Records within 1-mile radius;
- CA Toxic Pits Cleanup Act Sites within 1-mile radius;
- CA Bond Expenditure Plan within 1-mile radius;
- CA Hazardous Waste and Substances Sites List (CORTESE) within 0.5-mile radius;
- CA Spills, Leaks, Investigations, and Cleanup (SLIC) at the Project Site;
- CA Voluntary Cleanup Program Properties at the Project Site;
- CA Regional Water Quality Control Board at the Project Site;

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<sup>93</sup> Pages 10-11, *Phase I Environmental Site Assessment*, EBI Consulting, October 28, 2015.

- CA Hazardous Substance Storage Container Database at the Project Site;
- CA Solid Waste Information System at the Project Site;
- CA Waste Management Unit Database / Solid Waste Assessment Test at the Project Site;
- CA Hazardous Material Incident Report System at the Project Site;
- CA Hazardous Material Information system at the Project Site;
- CA Site Mitigation and Brownfields Reuse Program at the Project Site
- Tribal Environmental Databases.

Other databases had information related to the Project Site and/or surrounding properties and are discussed below.

### Database Search

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.<sup>94</sup> According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.<sup>95</sup>

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.<sup>96</sup> There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.<sup>97</sup> The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not

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<sup>94</sup> California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed December 8, 2016.

<sup>95</sup> California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, accessed December 8, 2016.

<sup>96</sup> California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed December 8, 2016.

<sup>97</sup> California Environmental Protection Agency, Cortese List Data Resources, List of “Active” CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, December 8, 2016.

been identified as a hazardous waste facility.<sup>98</sup> The Project Site has RECs associated with USTs. The removal of USTs will be conducted according to the regulations of the Los Angeles City Fire Department Underground Storage Tank Division. Impacts would be less than significant.

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

**No Impact.** The Project is not within an airport hazard area.<sup>99</sup> The nearest airport is Santa Monica Airport located approximately 1.65 miles south. Although the Project is within two miles of the Santa Monica Airport, there are substantial and varied land uses and other urban infrastructure (including the I-10 Santa Monica Freeway) between the airport and the Site to ensure that there would be no potential hazard. There are buildings in the area that are equivalent in height as the Project. Further, the airport's runway layout (northeast-southwest)<sup>100</sup> would ensure the flight paths do not cross over the Project Site, which is at 90 degree angle perpendicular from the runway. Therefore no impact would occur.

- f) **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** There are no nearby private airstrips. Therefore, no impacts will occur.

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

**Less Than Significant Impact with Mitigation Incorporated.** A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Santa Monica Boulevard is identified as a Selected Disaster Route.<sup>101</sup> However, construction of the Project will not substantially impede public access or travel on public rights-of-way such as Santa Monica Boulevard, Stoner Avenue, and Granville Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The Project will attempt to park and stage for construction on-site as much as possible. During portions of the construction

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<sup>98</sup> California Environmental Protection Agency, *Cortese List Data Resources*, *Cortese List: Section 65962.5(a)*, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, December 8, 2016.

<sup>99</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

<sup>100</sup> Santa Monica Airport Pilot's Guide: [http://www.smgov.net/uploadedFiles/Departments/Airport/Pilot\\_Outreach/SMO\\_Jet\\_%20Pilot%20Guide%202013.pdf](http://www.smgov.net/uploadedFiles/Departments/Airport/Pilot_Outreach/SMO_Jet_%20Pilot%20Guide%202013.pdf)

<sup>101</sup> *Critical Facilities and Lifeline Systems Map*, City of Los Angeles, 1995.

where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will attempted to be minimized and be conducted outside of peak traffic times. The future traffic conditions with the Project show that none of the study intersections or roadway segments would have a significant impact after mitigation.<sup>102</sup> Environmental impacts may result from Project implementation due to possible interference with an emergency response plan. However, these potential impacts will be mitigated to a less than significant level by **Mitigation Measure MM-8-1**. Therefore, impacts would be less than significant after mitigation.

### ***Mitigation Measure***

#### **MM-8-1      Emergency Evacuation Plan**

Prior to the issuance of a building permit, the applicant shall develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

- h)      Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**No Impact.** A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone,<sup>103</sup> nor does the Site contain any wildlands fire hazard terrain.<sup>104</sup> Therefore, no impacts will occur.

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<sup>102</sup> Tables 15 and 16, *Traffic Impact Study*, Overland Traffic Consultants, April 2016.

<sup>103</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

<sup>104</sup> Los Angeles Safety Element, Exhibit D, *Selected Wildfire Hazard Areas in the City of Los Angeles*: <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>.

## 9. HYDROLOGY AND WATER QUALITY

### a) Would the project violate any water quality standards or waste discharge requirements?

**Less Than Significant Impact.** A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.<sup>105</sup> Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater code) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPs)

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<sup>105</sup> *Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities\*; Retail gasoline outlets\*; Restaurants\* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). <http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/>*

(determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

### **Construction**

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the total site area is 1.34 acres)<sup>106</sup>, the Project Applicant will be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).<sup>107</sup> Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. The Project shall comply with the following regulatory compliance measures. Therefore, impacts related to water quality will be less than significant.

### ***Regulatory Compliance Measures***

#### **RCM-9-1 National Pollutant Discharge Elimination System General Permit**

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

#### **RCM-9-2 Low Impact Development Plan**

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<sup>106</sup> See Section 2, Project Description.

<sup>107</sup> California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: [http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/construction.shtml](http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml), August 26, 2015.

Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

### **RCM-9-3      Development Best Management Practices**

The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

### **Operation**

The Project would not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial increase in runoff as a result of the Project (which would continue to have automobiles, and typical cleaning elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The Project would be required to submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles and the State Water Resources Control Board (SWRCB) for review and approval prior to development of any drainage improvements. The Project operation is also required to comply with LID requirements. In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality would be less than significant.

- b)      Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

**Less Than Significant Impact.** A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is the Stone Canyon Reservoir, approximately 4.3 miles northeast of the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or



nearby. A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.<sup>108</sup>

The Project Site is located in an urbanized area of the City. The entire Project Site is currently developed with buildings and completely paved and impervious. Accordingly, the Project Site does not contribute significantly to groundwater recharge. The Project will similarly cover the entire Project Site with a building and paving. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge. Therefore, the Project will have no impact with respect to groundwater supplies or recharge.

The historic high groundwater in the Project area is approximately 25-30 feet below the ground surface. Based on current groundwater basin management practices, it is unlikely that the groundwater levels will ever exceed the historic high levels. Groundwater was not encountered to a depth of 85 feet beneath the existing ground surface (during the site-specific fault rupture investigation).<sup>109</sup> Groundwater can vary seasonally and groundwater seepage conditions can develop in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. Recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate Project Site vicinity. Proper surface drainage of irrigation and precipitation would be incorporated into the Project design.<sup>110</sup> Therefore impacts would be less than significant.

- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

**Less Than Significant with Mitigation Incorporated.** A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the Project. Proper surface drainage is critical to the future performance of the Project. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper Site drainage should be maintained at all times. The Project Site is also not near, nor would be altering, a stream or river. However, because the proposed building size and layout would differ as compared to the existing buildings, the Geotechnical Investigation provided surface drainage recommendations listed as **Mitigation Measure MM-9-1**. Therefore impacts would be less than significant.

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<sup>108</sup> LADWP, *Water, Sources of Water*: <https://www.ladwp.com/>

<sup>109</sup> *Report of Fault Rupture Investigation*, Geocon West, Inc., May 2016,

<sup>110</sup> *Geotechnical Investigation*, Geocon West, Inc., May 2016.

### **Mitigation Measure**

#### **MM-9-1 Surface Drainage**

- All Site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to pond anywhere on the Site, and especially not against any foundation or retaining wall. The Site shall be graded and maintained such that surface drainage is directed away from structures in accordance with 2013 CBC 1804.3 or other applicable standards. In addition, drainage shall not be allowed to flow uncontrolled over any descending slope. Discharges from downspouts, roof drains and scuppers are not recommended onto unprotected soils within five feet of the building perimeter. Planters which are located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support. Landscape irrigation is not recommended within five feet of the building perimeter footings except when enclosed in protected planters.
- Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. Pavement areas shall be fine graded such that water is not allowed to pond.
- Landscaping planters immediately adjacent to paved areas are not recommended due to the potential for surface irrigation or irrigation water to infiltrate the pavement's subgrade and base course. Either a subdrain which collects excess irrigation water and transmits it to drainage structures, or an impervious above-ground planter boxes shall be used. In addition, where landscaping is planned adjacent to the pavement, it is recommended that considerations be given to providing a cutoff wall along the edge of the pavement that extends at least 12 inches below the base material.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

**Less Than Significant Impact.** A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The Project Site is currently completely paved and the Project would have a similar amount of paving and impervious surface. The drainage will not change because there are no changes in slopes or topography that would occur as part of the Project. Thus, the rate of run-off would not increase. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding will be less than significant.

- e) **Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Drainage across the Site is by surface flow toward the existing storm drain system. The storm flow direction is south on Stoner, west on Santa Monica, and south on Granville.<sup>111</sup>

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the SUSMP BMPs, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

### ***Construction***

Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. When properly designed and implemented, these “good-housekeeping” practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The project is required to comply with the City of Los Angeles’ Low Impact Development (LID) Best Management Practices (BMPs), which are determined on a case by case basis by the Department of Public Works. Approval for development project and building/grading permits will not be granted or issued until appropriate and applicable stormwater BMPs are incorporated into the project design plans.

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<sup>111</sup> Navigate LA Stormwater information: <http://navigatela.lacity.org/navigatela/>

### **Operation**

The entire Project Site is currently developed with buildings and surface parking. The Project will not result in a substantial change in the amount of impervious surface area at the Project Site, and would therefore not be anticipated to result in an increase in stormwater runoff from the Project Site. Activities associated with Project operation will not generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking area could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, there is already surface parking on the Site so no new source of potential pollutants would occur. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated to minimize off-site conveyance of pollutants, and LID in the City of Los Angeles. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

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

**Less Than Significant Impact.** A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

**g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**No Impact.** This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project includes residential dwelling units; however, it would not be located in a 100-year flood hazard area according to the Los Angeles Safety Element map.<sup>112</sup> According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.<sup>113</sup> A 0.2 percent annual chance is equivalent to a 500-year flood (the general range is 10 years to 500 years). Therefore, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue would occur.

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<sup>112</sup> Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>.

<sup>113</sup> FEMA, Flood Insurance Rate Maps, DFIRM 06037C1590F: <https://msc.fema.gov/portal>, December 8, 2016.

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

**No Impact.** A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not located within a designated 100- or 500-year floodplain.<sup>114</sup> Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

**i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**Less Than Significant Impact.** A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface water in the vicinity is the Stone Canyon Reservoir, approximately 4.3 miles northeast of the Project Site. The Project Site is nearby a potential inundation area that covers much of West LA.<sup>115</sup> However, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.<sup>116</sup>

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD).<sup>117</sup> DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey

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<sup>114</sup> Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>.

<sup>115</sup> Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>.

<sup>116</sup> Page II-16, Los Angeles Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/safteylt.pdf>.

<sup>117</sup> <http://www.water.ca.gov/damsafety/>

equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.<sup>118</sup>

Therefore, the Stone Canyon Reservoir, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential dam or levee failure will not be exacerbated by the development of the Project. Impacts related to flooding will be less than significant.

**j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?**

**Less Than Significant Impact.** A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake.

The nearest surface water in the vicinity is the Stone Canyon Reservoir, approximately 4.3 miles northeast of the Project Site. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.<sup>119</sup> The Project Site is not located within an area potentially impacted by a tsunami, which is typically located along the coast of the Pacific Ocean.<sup>120</sup> The Project Site is not within a Hillside Area.<sup>121</sup>

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<sup>118</sup> LADWP, Water System Reservoir Surveillance Program: [http://eng.lacity.org/projects/fmp/pdf/handout4\\_042009.pdf](http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf)

<sup>119</sup> Page II-16, Los Angeles Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

<sup>120</sup> Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

<sup>121</sup> ZIMAS search for 11752 Santa Monica website: <http://zimas.lacity.org/>.

In addition, the City of Los Angeles ZIMAS mapping system<sup>122</sup> and the Safety Element of the City of Los Angeles<sup>123</sup> do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. Further, according to the State of California Seismic Hazards Map<sup>124</sup>, the Project Site is not at risk for landslides.<sup>125</sup> Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Impacts related to tsunamis, seiches, and mudflow will be less than significant.

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<sup>122</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

<sup>123</sup> Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, December 8, 2016.

<sup>124</sup> California, Department of Conservation, Landslide Maps: <http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm>, December 8, 2016.

<sup>125</sup> Landslide Inventory Map of the Beverly Hills Quadrangle, California Geological Survey, March 1999: [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_bevh.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_bevh.pdf), December 8, 2016.

## 10. LAND USE AND PLANNING

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

**No Impact.** A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project Site (as shown in Figure 2-2) is essentially comprised of one City block on the south side of Santa Monica Boulevard bounded by Granville Avenue to the west, Stoner Avenue to the east and a public alley to the south. The Project is not of a scale or nature that could physically divide an established community. The Project is not affecting any right-of-ways. The Project would be built on an existing urban infill site currently improved with structures. As such, no impact related to physical division of an established community will occur.

### b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

**Less Than Significant Impact.** A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The legal standard that governs consistency determinations is that a project must only be in “harmony” with the applicable land use plan to be consistent with that plan.<sup>126</sup> The following is a list of applicable plans:

#### **Regional Level**

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<sup>126</sup> See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4<sup>th</sup> 704, 717-18 [upholding a city’s determination that a subdivision project was consistent with the applicable general plan]. As the Court explained in *Sequoyah*, “state law does not require an exact match between a proposed subdivision and the applicable general plan.” To be “consistent” with the general plan, a project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning, the project must be “in agreement or harmony with the applicable plan.” (see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4<sup>th</sup> at p. 678.) Further, “[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.” (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4<sup>th</sup> 807, 817.) Courts also recognize that general plans “ordinarily do not state specific mandates or prohibitions,” but instead provide “policies and set forth goals.” (*Friends of Lagoon Valley*.)



*Southern California Association of Governments*

*Regional Comprehensive Plan and Guide (RCPG)*

*Regional Comprehensive Plan (RCP)*

*Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS)*

*South Coast Air Quality Management District's (SCAQMD)*

*Air Quality Management Plan (AQMP)*

*Los Angeles County Metropolitan Transportation Authority's (Metro)*

*Congestion Management Plan (CMP) for Los Angeles County.*

***City of Los Angeles***

- *City of Los Angeles General Plan*
- *West Los Angeles Community Plan*
- *West Los Angeles Transportation Improvement and Mitigation Specific Plan*
- *ZI-2442 Preliminary Fault Rupture Study Area*
- *ZI-2452 Transit Priority Area in the City of Los Angeles*
- *Los Angeles Municipal Code*

**Consistency with Regional Plans**

Regional Comprehensive Plan and Guide (RCPG)

The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

- A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

- A proposed residential development of more than 500 dwelling units.
- A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
- A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
- A proposed hotel/motel of more than 500 rooms.
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
- A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.
- A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.
- A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.
- A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.
- A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.
- A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapter's overall goals are to:<sup>127</sup>

1. re-invigorate the region's economy,
2. avoid social and economic inequities and the geographical dislocation of communities, and
3. to maintain the region's quality of life.

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<sup>127</sup> SCAG, RCPG Growth Management Chapter, page 3-1:  
<http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPG GrowthManagementChapter.pdf>

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with, or not interfere with implementation of, the goals of the Growth Management Chapter of the RCPG. The Project would include residential and commercial uses to provide additional jobs, revenue, and economic activity in the area. The Project would not dislocate a community or increase social or economic inequalities. The Project would include a residential use near similar compatible uses, such as commercial uses in West Los Angeles.

#### Sustainability Planning Grant Program

The Sustainability Planning Grant Program (formerly known as Compass Blueprint Grant Program) was established as an innovative vehicle for promoting local jurisdictional efforts to test local planning tools. Since starting in 2005, 133 projects have been completed through the program, with another 69 projects to be completed by the end of 2016.<sup>128</sup> The Project is not listed as one of the projects in the program.

#### Regional Comprehensive Plan (RCP)

SCAG's 2008 RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. Table 3.10-1, SCAG Regional Comprehensive Plan, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

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<sup>128</sup> [Sustainability Planning Grant Program:  
http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx](http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx)

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

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making the best transportation and land use choices for the future and supporting those choices with wise investments. The RTP will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP will create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2040. The RTP is built on the vision of mobility, economy, and sustainability.<sup>129</sup> The RTP contains goals and policies that are directed to transportation planners and decision-makers. They are not applicable to local and private projects, such as this Project. Nonetheless, they are provided below:

### *Goals*

- Align the plan investments and policies with improving regional economic development and competitiveness
- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for all people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the productivity of our transportation system
- Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
- Actively encourage and create incentives for energy efficiency, where possible
- Encourage land use and growth patterns that facilitate transit and non-motorized transportation
- Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

### *Policies*

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators

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<sup>129</sup> SCAG, RTP: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>

2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region
3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives
4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1
5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1
6. The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.
7. The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run
8. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan

#### Applicability of SCAG Plans

The goals and policies of the RCPG, Sustainability Program, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206.<sup>130</sup> The consideration for a residential development is more than 500 dwelling units and commercial building is employing more than 1,000 persons or more than 250,000 square feet. The Project would have approximately 154 residential units and approximately 15,117 square feet of retail and restaurant uses. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, RCP, or RTP. Nonetheless, for purposes of disclosure, the consistency with regional plans is included.

#### ***South Coast Air Quality Management District (SCAQMD)***

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<sup>130</sup> CEQA, Section 15206, *Projects of Statewide, Regional, or Areawide Significance*: [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/Handout\\_CCR\\_15206\\_Statewide,Regional,Areawide\\_052007.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf), February 19, 2016.

### Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP).<sup>131</sup> The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

Although the Project will increase population (see Section 13, Population and Housing discussion of this IS/MND), as discussed in Section 3 above, the Project's impacts on regional air quality is accommodated by the overall growth assumptions in the 2012 AQMP. Additionally, the Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. The Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

### ***Los Angeles County Metropolitan Transportation Authority (Metro)***

#### Congestion Management Plan (CMP) for Los Angeles County.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP. See Section 16, Transportation and Traffic, question b, in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion: No CMP intersection (Santa Monica and Bundy) or freeway (Santa Monica Freeway or San Diego Freeway) impact is anticipated.<sup>132</sup>

### **Consistency with City and Local Plans**

#### ***City of Los Angeles General Plan***

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic

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<sup>131</sup> SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>

<sup>132</sup> *Traffic Impact Study*, Overland Traffic Consultants, April 2016.

goals.<sup>133</sup> The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Plan for Healthy LA, Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Services Systems/Public Recreation Plan, Safety Element, and Mobility Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

### ***West Los Angeles Community Plan***

The Project Site is located within the West Los Angeles Community Plan (WLA CP) which was adopted in July 1999.<sup>134</sup> The WLA CP is the Land Use Element of the City's General Plan. The WLA CP's land use designation for the Project Site is General Commercial and the zoning is C2-1VL..

### ***General Commercial***<sup>135</sup>

The land use definition "General Commercial" applies to a diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets. The WLA CP includes General Commercial on portions of Wilshire, Santa Monica, Pico and National Boulevards. The south side of Wilshire Boulevard has been developed with high rise office buildings and one to three story retail and office buildings. Land uses on Pico and National Boulevards include one to three story retail buildings. The south side of Santa Monica Boulevard is predominantly improved with retail and office uses, but also supports several older low-density apartment buildings, motels and auto-oriented establishments.

Table 3.10-2, General Plan Land Use, lists the goal, objective, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the General Plan for each land use. The Project's integration of residential and commercial uses in a commercially-designated land use area, with residential uses nearby to the south, is consistent with the goal and objective of the General Plan Framework. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

The WLA CP also contains policies and objectives to guide development and uses planned within the City. Not every goal, policy, or objective is applicable to the Project or the Project Site. The WLA CP is intended to promote an arrangement of land use, circulation, and services that will encourage and

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<sup>133</sup> California Government Code Section 65300.

<sup>134</sup> West Los Angeles Community Plan: <http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf>

<sup>135</sup> General Plan, Chapter 3-Land Use: <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm>

contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits; land development and other trends; and protect investment to the extent reasonable and feasible. The goals of the WLA CP are:

1. A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.
2. A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe, and accessible areas while preserving historic and cultural character.
3. Sufficient land for a variety of industrial uses with mun(sic) employment opportunities that are safe for the environment and the workers, and which have minimal adverse impact on adjacent uses.
4. Adequate recreation and park facilities which meet the needs of the residents in the community.
5. Sufficient open space in balance with new development to serve the residential, environmental, health, and safety needs of the community and to protect environmental and aesthetic resources.
6. Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City.
7. Ensure that adequate library facilities are provided for community residents.
8. A community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidents of crime, and provide other necessary law enforcement services.
9. Protect the community through a comprehensive fire and life safety program.
10. Develop a public transit system that improves mobility with convenient alternatives to automobile travel.
11. Encourage alternative modes of travel over the use of single occupancy vehicles (SOV) to reduce vehicular trips.
12. A system of safe, efficient, and attractive bicycle and pedestrian routes.
13. A sufficient supply of well designed and convenient on-street parking and off-street parking facilities throughout the plan area.
14. Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls.



15. A well maintained, safe, efficient freeway, highway, and street network.
16. A system of highways, freeways, and streets that provides a circulation system which supports existing and planned land uses while maintaining a desired level of service at all intersections.
17. Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance.

Table 3.10-3, WLA CP, sets forth the objectives and policies for residential and commercial uses and discusses the Project's consistency and applicability with each. The goals and objectives are directed to the City (government) and other various departments and agencies within, to coordinate and encourage certain types of development, while preserving open space. The Project has sent information requests describing the Project to the various public service and utility providers. In addition, the Project does not include industrial uses (Goal 3), or public and institutional land uses such as parks, open space, schools, libraries, fire, transportation, or historic or cultural resources (Goals 4 through 17). The provisions of public services and utilities are coordinated by the various agencies (LAFD, LAPD, Parks and Recreation, and Library). The Project would not conflict with any of the objectives. The WLA CP also contains policies and standards for circulation (directed to LADOT and Metro), recreation and parks (directed to LADRP), fire protection (directed to LAFD), public schools (directed to LAUSD), library (directed to the LAPL), and other public facilities (directed to energy provider LADWP). As such, these, policies and standards do not apply to private developments, and are not applicable to this Project. The Project would also be consistent with all applicable urban design policies related to the buildings siting, location, uses, and design features for commercial and multiple residential projects.

### ***West Los Angeles Transportation Improvement and Mitigation Specific Plan***

The Project is within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The WLA TIMP provides a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new development within the area and establish Transportation Impact Assessment (TIA) Fee process for new development in the C, M, and P zones.<sup>136</sup> Other purposes include: regulate phased development, establish an infrastructure implementation process, promote area wide transit enhancements, promote ridesharing and bicycling to reduce peak hour trips, prevent peak hour deterioration to Level of Service (LOS) F or no further deterioration in LOS F intersections, promote programs for neighborhood protection, promote coordinated and comprehensive transportation programs with other jurisdictions and agencies, insure that public transportation facilities that are constructed by WLA TIMP funds will benefit the contributor and encourage Caltrans to widen the I-405 freeway for high occupancy vehicle (HOV) lanes. The HOV lanes have been installed and the I-405

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<sup>136</sup> West LA TIMP: <http://cityplanning.lacity.org/complan/specplan/pdf/WLATIMP.PDF>

Sepulveda Pass Improvement Project is completed.<sup>137</sup> The WLA TIMP analysis is incorporated within the traffic study, which is included as Appendix B.

#### ***ZI-2442 Preliminary Fault Rupture Study Area***

Effective January 1, 2015, the western half of the Site (APNs 4262-006-005, -004, -001, -021) is located within the State of California identified Preliminary Fault Rupture Study Area (PFRSA). The PFRSAs are intended to act as temporary Earthquake Fault Zones until the State Geological Survey established permanent Alquist-Priolo Fault Zones, based in part, on the geologic investigations produced by the City of Los Angeles. When proposed development is found to be in PFRSA zone, applicants shall be informed to comply with the fault investigation requirements of the Alquist-Priolo Fault Zoning Act.<sup>138</sup> As such a Fault Rupture Hazard Investigation was conducted for the Site as described above.

#### ***ZI-2452 Transit Priority Area in the City of Los Angeles***

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.<sup>139</sup>

The Project contains multiple uses, include retail, restaurant, and residential. The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.<sup>140</sup> The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.<sup>141</sup> ZI-2452 also identifies the Project Site as located in a transit priority area.

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<sup>137</sup> Metro Project: <https://www.metro.net/projects/i-405/>

<sup>138</sup> ZI-2442: <http://zimas.lacity.org/documents/zoneinfo/ZI2442.pdf>

<sup>139</sup> <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>

<sup>140</sup> California Public Resources Code Section 21099(a)(4)

<sup>141</sup> California Public Resources Code Section 21099(a)(7)

The Project is a mixed-use infill development, including 187 dwelling units and retail and restaurant use. The Site is located within a transit priority area. The intersection of Santa Monica Boulevard and Bundy Drive is 2,250 feet away (within the ½ mile) and includes Metro 4, Rapid 704 and Big Blue Bus (BBB) lines 1, 14, Rapid 10. BBB 1<sup>142</sup> along Santa Monica Boulevard, has a frequency of every 10-12 minutes and Rapid 704<sup>143</sup> along Santa Monica Boulevard, has a frequency of every 10-15 minutes during AM and PM commute times (whereas the requirement is 15 minutes). Further, the Project site is located in an urban area on a lot currently developed with auto dealership uses and surface parking.

## **City of Los Angeles Planning and Zoning Code**

### ***Zoning***

The C2-1VL (Commercial Zone, Height District 1-Very Limited) allows commercial, retail, and residential uses by right.<sup>144</sup> Residential density is permitted at one dwelling unit for every 400 square feet of lot area.

### ***Height and Floor-Area-Ratio (FAR)***

The Site is within Height District 1-Very Limited, which imposes a height limit of 45 feet and 3 stories and an FAR limit of 1.5:1. The Project is seeking an on-menu density bonus incentive to increase FAR to 3.0:1 in lieu of the 1.5:1 otherwise permitted in the C2-1VL zone as permitted by LAMC Section 12.22.A.25(f)(4)(ii); and an off-menu incentive to increase the height to 5 stories no higher than 56 feet in lieu of the 3 stories no higher than 45 feet otherwise permitted in the C2-1VL zone for a mixed use project as permitted by LAMC Section 12.22.A.25(g)(3).

This increase in FAR and height would allow the Project to be more consistent with recent increases in FAR and height in the area including the residential development on the corner of Santa Monica and Federal. It will also allow the Project to restrict 11 percent of its base residential density to persons and families of very low income. The increase would also allow the development of residential and retail space in the West LA Community.

### ***Yards***

The C2 zone has no front yard requirements and no side and rear yard requirements for commercial uses; generally R4 zone yard standards for residential uses at lowest residential story would apply.<sup>145</sup> Pursuant

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<sup>142</sup> <http://www.bigbluebus.com/Routes-and-Schedules/Route-1.aspx>

<sup>143</sup> [https://d1akjheu06qp1r.cloudfront.net/riding\\_metro/bus\\_overview/images/704.pdf](https://d1akjheu06qp1r.cloudfront.net/riding_metro/bus_overview/images/704.pdf)

<sup>144</sup> Los Angeles, Generalized Summary of Zoning Regulations: [http://cityplanning.lacity.org/zone\\_code/Appendices/sum\\_of\\_zone.pdf](http://cityplanning.lacity.org/zone_code/Appendices/sum_of_zone.pdf)

<sup>145</sup> Summary of Zoning Regulations: [http://cityplanning.lacity.org/zone\\_code/Appendices/sum\\_of\\_zone.pdf](http://cityplanning.lacity.org/zone_code/Appendices/sum_of_zone.pdf)

to LAMC Section 12.22.A.18(c)(3) yard requirements do not apply to residential portions of mixed-use buildings on C2 zoned lots if the residential portions abut a street or alley and the first floor is used for commercial purposes or residential access. As shown on Figure 2-2, the Project Sites' rear lot line abuts an alley, and the side and front lot lines abut public streets. The ground floor is used almost entirely for commercial purposes with some residential access points. Accordingly, the Project's residential portions are not required to observe any yards. The Project is designed to be consistent with these standards.

## **Conclusion**

The requested discretionary actions do not conflict with urban land uses in the area and the Project would not introduce a new incompatible use. With the approval of the requested entitlements, the Project will be consistent with the FAR, height, and stories. The Project is consistent with the SCAG guides and other regional guides, the General Plan, the WLA CP objectives and policies, to the extent feasible and applicable. As such, impacts with respect to applicable land use plans, policies and zoning would be less than significant.

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

**No Impact.** A significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized and fully developed portion of the City. Due to the existing urban development on the Project Site, and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. Therefore, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

**Table 3.10-1**  
**SCAG Regional Comprehensive Plan**

Policies	Discussion
<b>Land Use and Housing<sup>1</sup></b>	
<p><b>LU-6.2</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<b>Open Space and Habitat<sup>2</sup></b>	
<p><b>OSN-14</b> Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> <li>Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space.</li> <li>Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines.</li> <li>Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.</li> <li>Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements.</li> </ul>	<p><b>Consistent.</b> The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located in a developed area of West Los Angeles surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. There are five street trees on the City sidewalk along Santa Monica Boulevard. These off-site street trees are part of the City's planting program and not native originating (natural to the location) trees. If the Project were to impact these trees, a potential impact may result due to the loss of trees in the public right-of-way. However, this potential impact will be mitigated to less than significant level by <b>Mitigation Measure MM-4-1</b>.</p>

Policies	Discussion
<ul style="list-style-type: none"> <li>Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects.</li> </ul>	
<b>OSC-9</b> Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	<b>Not Applicable.</b> OSC-9 does not apply to this Project as it is not next to natural areas for outdoor recreation. The Site would not impede access to natural lands.
<b>OSC-10</b> Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	<b>Consistent.</b> The Project is an infill development in an existing community.
<b>OSC-11</b> Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	<b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<b>OSC-12</b> Developers and local governments should promote water-efficient land use and development.	<b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<b>OSC-13</b> Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	<b>Consistent.</b> The Project would contain multiple uses (residential and commercial) and be a redevelopment of an urban area.
<b>Water</b> <sup>3</sup>	
<b>WA-9</b> Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	<b>Consistent.</b> The Project includes conservation features (regulatory compliance measures) to reduce operational water use, per LADWP and LAMC requirements.
<b>WA-10</b> Developers and local governments should include conjunctive use as a water management strategy when feasible.	<b>Consistent.</b> Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form of conjunctive use utilizes artificial recharge, where surface water is intentionally

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	percolated or injected into aquifers for later use. The Project would not conflict or preclude the City from exploring conjunctive use as a water management strategy.
<b>WA-11</b> Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	<b>Consistent.</b> The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project shall implement any upgrade to the water infrastructure serving the Project Site that is needed to accommodate the water consumption needs.
<b>WA-12</b> Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	<b>Consistent.</b> The Project would include landscaping on the ground floor, courtyards, and rooftop level that is irrigated with water conservation techniques
<b>WA-13</b> Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government’s ‘no net loss’ wetlands policy should be applied to all of these land resources.	<b>Consistent.</b> The Project would not impact wetlands.
<b>WA-27</b> Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and on-site mitigation.	<b>Consistent.</b> The Site is currently developed with buildings and parking. The Project will similarly cover the entire site with a building. The Project will not result in a change in the amount of impervious surface area at the Project Site.
<b>WA-32</b> Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	<b>Consistent.</b> The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the City of Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<b>Energy</b> <sup>4</sup>	
<b>EN-8</b> Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: <ul style="list-style-type: none"> <li>Mixed-use residential and commercial development that is connected with public</li> </ul>	<b>Consistent.</b> The Project would be a mixed-use residential and commercial development that is in proximity to local transit lines, including Metro buses. The Project would encourage biking and walking trips due to bicycle parking and within a pedestrian-oriented area along Santa Monica Boulevard.

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<p>transportation and utilizes existing infrastructure.</p> <ul style="list-style-type: none"> <li>Land use and planning strategies to increase biking and walking trips.</li> </ul>	
<p><b>EN-10</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>Using energy efficient materials in building design, construction, rehabilitation, and retrofit</li> <li>Encouraging new development to exceed Title 24 energy efficiency requirements.</li> <li>Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.</li> <li>Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at <a href="http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits">http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits</a>.</li> <li>Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.</li> <li>Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings.</li> <li>Encouraging neighborhood energy systems, which allow communities to generate their own electricity</li> <li>Orienting streets and buildings for best solar access.</li> <li>Encouraging buildings to obtain at least 20% of their electric load from renewable energy.</li> </ul>	<p><b>Consistent.</b> The Project would be in compliance with the City's Green Building Ordinance, which contains energy efficient practices.</p>
<p><b>EN-11</b> Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure</p>	<p><b>Consistent.</b> The LADWP does not provide consumption rates so the SCAQMD rates are used to calculate estimated electrical usage for the Utilities section of this IS/MND. Electrical service is available and will be provided in accordance with the LADWP's</p>



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improvements necessary for project construction should be completed according to the specifications of the energy provider.	Rules Governing Water and Electric Service. Southern California Gas Company (SCG) would serve the Project's natural gas needs. In the event that SCG cannot provide service from the existing infrastructure, SCG will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.
<b>EN-12</b> Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	<b>Consistent.</b> This is an encouragement to incorporate solar panels, not a requirement. Solar panels would not be precluded from being able to be placed on the roof.
<b>EN-14</b> Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	<b>Consistent.</b> The Project retail component would comply with the LAMC requirements for all mandatory (Code-required) transportation measures to reduce single-occupancy vehicle trips.
<b>Solid Waste</b> <sup>5</sup>	
<p><b>SW-14</b> Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>• Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.).</li> <li>• Reuse of existing building structure and shell in renovation projects.</li> <li>• Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</li> <li>• Development of indoor recycling program and space.</li> </ul>	<b>Consistent.</b> The Project would include a demolition and construction waste recycling program as well as an operational recycling program as required by LAMC. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

Policies	Discussion
<ul style="list-style-type: none"> <li>• Design for deconstruction.</li> <li>• Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.</li> </ul>	
<b>SW-17</b> Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	<b>Not Applicable.</b> The Project would not be a composting, or composting, recycling, or conversion technology facility.
<b>SW-18</b> Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	<b>Not Applicable.</b> The Project would not be a waste management facility.
<b>SW-19</b> Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	<b>Not Applicable.</b> The Project would not be an eco-industrial park.
<b>SW-20</b> Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	<b>Not Applicable.</b> The Project would not be a solid waste management facility.
<p>SCAG Regional Comprehensive Plan: <a href="http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf">http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf</a>  <sup>1</sup> Page 21; <sup>2</sup> Pages 34 and 39; <sup>3</sup> Pages 59-61; <sup>4</sup> Pages 75-76; <sup>5</sup> Pages 105-106            Table: CAJA Environmental Services, February 2016.</p>	

**Table 3.10-2  
General Plan Land Use Framework Element**

Goal, Objective, Policies	Discussion
<b>Commercial</b>	
<b>GOAL 3H</b> Lower-intensity highway-oriented and local commercial nodes that accommodate commercial needs outside centers and districts.	<b>Consistent.</b> The Project would include retail outside of a commercial center or district.
<b>Objective 3.12</b> Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	<b>Consistent.</b> The Project would provide retail uses that would serve the surrounding neighborhood.
<b>Policy 3.14.1</b> Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.	<p><b>Consistent.</b> According to Table 3-1, the General Commercial category has the following typical uses:</p> <ul style="list-style-type: none"> <li>• Uses as permitted by existing zoning (generally, uses permitted in the C 2 zone, including residential and commercial retail uses).</li> <li>• Modifications to be determined by the community plans</li> <li>• Potential adjustment of density to reflect parcel size and configuration, intended functional role, and characteristics of surrounding uses determined through the community plan process</li> </ul> <p>The Project includes uses permitted in the C2 zone,</p> <p>According to Table 3-7, the General Commercial land use designation corresponds to C2 zone for the Project Site. The Project is seeking a density bonus on-menu incentive to permit an FAR of 3.0 to 1 in lieu of the 1.5 to 1 FAR otherwise permitted in the C2-1VL zone as allowed by the LAMC's density bonus regulations, and an off-menu incentive to permit a height of 5 stories and 56 feet in lieu of the 3 stories and 45 feet otherwise permitted in the C2-1VL zone as allowed by the LAMC's density bonus regulations.</p>
<b>Policy 3.12.2</b> Consider adjusting permitted densities of areas designated for General Commercial, where existing buildings are developed at densities substantially below the maximum permitted by amendments to the community plans, where appropriate, based on consideration of the following:	<b>Consistent.</b> The current buildings have a 0.42:1 FAR which is below the allowed 1.5:1 FAR. Thus the Site is not being used efficiently. The Site does not abut single family residential. There is multi-family residential to the south. The Site can support adequate onsite parking and a driveway on Stoner. The Project would be of scale and

Goal, Objective, Policies	Discussion
<p>a. Where commercial parcels of less than 150 feet in depth abut areas designated for single-family residential;</p> <p>b. Where the total area and/or configuration of the commercial parcel precludes the development of adequate on-site parking, unless adjacent to a transit station or code-required parking is provided in a common parking facility in proximity to the site;</p> <p>c. Where site driveways may adversely impact traffic flows along principal streets or in adjacent residential neighborhoods; and/or</p> <p>d. Where there are local community objectives for the preservation of the prevailing scale and character of development.</p>	<p>height of similar projects along Santa Monica Boulevard.</p>
<p><b>Policy 3.12.3</b> Permit the re-construction of existing commercial structures destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing intensity</p>	<p><b>Not Applicable.</b> The structures were not destroyed by natural disaster.</p>
<p><i>General Plan, Chapter 3-Land Use, General Commercial: <a href="http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm">http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm</a></i>  <i>Table: CAJA Environmental Services, December 2016.</i></p>	

**Table 3.10-3  
West Los Angeles Community Plan**

Objective and Policies	Discussion
<b>Residential</b>	
<b>Objective 1-1</b> To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	<b>Consistent.</b> The Project provides residential, employment, and retail services in the West LA area.
<b>Policy 1.1-1</b> Protect existing single family residential neighborhoods from new out-of-scale development and other incompatible uses.	<b>Consistent.</b> The nearest single-family residences are buffered from the Site by both distance (approximately 1,900 feet southwest) and intervening structures.
<b>Policy 1.1-2</b> Promote neighborhood preservation in all residential neighborhoods.	<b>Consistent.</b> The Project would not impact existing residential neighborhoods but would be on a commercial land use along Santa Monica Boulevard.
<b>Policy 1.1-3</b> Provide for adequate multi-family residential development.	<b>Consistent.</b> The Project would provide multi-family residential uses, including very low income dwelling units, to a Project Site that does not currently contain any residential uses.
<b>Objective 1-2</b> To reduce vehicular trips and congestion by developing new housing in proximity to adequate services and facilities.	<b>Consistent.</b> The Project provides residential uses near commercial, services, and office uses along Santa Monica Boulevard, which is also a major transit corridor.
<b>Policy 1.2-1</b> Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	<b>Consistent.</b> The Project would introduce multi-family residential uses in the highly urbanized West Los Angeles area nearby (4,100 feet) the Metro Expo Line Station at Exposition Boulevard and Bundy Drive, as well as major thoroughfares providing multiple bus lines and commercial and retail opportunities. The surrounding area is well established with existing public service facilities and infrastructure.
<b>Policy 1.2-2</b> Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation.	<b>Not Applicable.</b> The Project is not a senior housing development but would not preclude senior citizens from living in the development.
<b>Policy 1.2-3</b> Do not increase residential densities beyond those permitted in the Plan unless the necessary infrastructure and transportation systems are available to accommodate the increase.	<b>Consistent.</b> The Project would slightly increase residential density using a density bonus authorized by applicable state law and City ordinance. The Project Site would increase the FAR on the Site according to an established Density Bonus on-menu incentive, and would increase height using an off-menu incentive as permitted by the City's Density Bonus Ordinance. The Project Site is in close proximity to the Metro Expo Line Station at Exposition Boulevard and Bundy Drive and is also served by multiple bus lines. Finally, the Project Site is well served by existing public service facilities and infrastructure.

Objective and Policies	Discussion
<b>Objective 1-3</b> To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	<b>Consistent.</b> The Project would not affect existing residential uses or neighborhoods.
<b>Policy 1.3-1</b> Require architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing residential neighborhoods.	<b>Consistent.</b> The Project would increase compatibility with nearby residential buildings by removing an auto dealership with open parking lots and small buildings and developing a residential and retail building that incorporates parking internally.
<b>Policy 1.3-2</b> Proposals for change to planned residential density should consider factors of neighborhood character and identity, compatibility of land uses, impacts on livability, public services and facilities, and traffic levels.	<b>Consistent.</b> The Project aesthetics, massing, and height consider other nearby buildings and is not out of scale with other residential developments or buildings along Santa Monica Boulevard. Mitigation measures are proposed for public services and traffic to reduce impacts to less than significant levels.
<b>Objective 1-4</b> To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens	<b>Consistent.</b> The Project includes a variety of housing sizes from studio to 3-bedroom, and live/work units, at a range of price points, including very low income dwelling units.
<b>Policy 1.4-1</b> Promote greater individual choice in type, quality, price and location of housing.	<b>Consistent.</b> The Project includes a variety of housing sizes from studio to 3-bedroom, and live/work units, at a range of price points, including very low income dwelling units.
<b>Policy 1.4-2</b> Ensure that new housing opportunities minimize displacement of residents.	<b>Consistent.</b> The Site contains no residences and would not displace residents.
<b>Policy 1.4-3</b> Encourage multiple residential development in specified commercial zones.	<b>Consistent.</b> The Project would introduce both new residential and commercial uses.
<b>Commercial</b>	
<b>Objective 2-1</b> To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.	<b>Consistent.</b> The Project would include commercial uses within an existing commercial area along Santa Monica Boulevard.
<b>Policy 2.1-1</b> New commercial uses shall be located in existing established commercial areas or shopping centers.	<b>Consistent.</b> The Project would provide new commercial opportunities on an existing underutilized Site. The commercial uses would be compatible with existing retail along Santa Monica Boulevard.
<b>Policy 2.1-2</b> Protect commercially planned/zoned areas from encroachment by residential only development.	<b>Consistent.</b> The Project would provide a mix of uses including residential and retail uses. The Project would not place a residential only development on a commercially zoned site.

Objective and Policies	Discussion
<b>Policy 2.1-3</b> Ensure the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.	<b>Consistent.</b> The Project would provide new commercial opportunities to serve the future Project residents, employees, and surrounding neighborhoods.
<b>Objective 2-2</b> To promote distinctive commercial districts and pedestrian-oriented areas.	<b>Consistent.</b> The Project would develop an underutilized site and provide ground floor retail uses to enhance the pedestrian experience along Santa Monica Boulevard.
<b>Policy 2.2-1</b> Encourage Pedestrian-oriented design in designated areas and in new development.	<b>Consistent.</b> The Project would be a pedestrian-friendly development given its pedestrian access to the Site along Santa Monica Boulevard's sidewalk.
<b>Policy 2.2-2</b> Promote mixed-use projects along transit corridors and in appropriate commercial areas.	<b>Consistent.</b> The Project would introduce a mixed-use residential and retail development in close proximity (4,100 feet) to the Metro Expo Line Station at Exposition Boulevard and Bundy Drive, and adjacent to Santa Monica Boulevard, which provide bus lines and commercial and retail opportunities.
<b>Policy 2.2-3</b> Require that mixed use projects and development in pedestrian oriented districts be designated and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.	<b>Consistent.</b> The Project would be a pedestrian-friendly development given its pedestrian access along Santa Monica Boulevard's sidewalk. The Project would also increase compatibility with many of the surrounding properties as compared to the existing auto dealership uses on the Project Site by providing residential and community-serving commercial uses on the Project Site.
<b>Policy 2.2-4</b> Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-station, and/or other appropriate human service facilities as part of the project.	<b>Not Applicable.</b> This is an encouragement, not a requirement. The Project is not of a large regional size or scale to include libraries, community rooms, police sub-station, or other human services beyond the open space and recreation amenities for the residents.
<b>Policy 2.2-5</b> Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.	<b>Consistent.</b> The Project would provide street level linear building frontage devoted to commercial land uses in order to promote street level pedestrian activity.
<b>Objective 2-3</b> To enhance the appearance of commercial districts.	<b>Consistent.</b> The Project would develop an underutilized site with a new building.
<b>Policy 2.3-1</b> Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.	<b>Consistent.</b> The Project would be a pedestrian-friendly development given its pedestrian access along Santa Monica Boulevard's sidewalk. The Project would also increase compatibility with many of the surrounding properties as compared to the existing auto dealership uses on the Project Site by providing residential and community-serving commercial uses on the Project Site.

Objective and Policies	Discussion
<b>Policy 2.3-2</b> Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.	<b>Consistent.</b> The Project would be designed with quality materials, architectural features to break up the massing and make a distinction between the commercial lower level and the residential upper levels. The building would be compatible with the residential community to the south and the commercial corridor along Santa Monica Boulevard.
<b>Urban Design</b>	
<b>Commercial (Site Planning)</b>	
1. Locating surface parking areas between commercial and residential areas, where appropriate to provide a buffer, and should be separated from residential uses by means of at least a solid wall and/or landscaped setback.	<b>Consistent.</b> Parking would be within an enclosed garage within the building.
2. Minimizing the number of driveways providing access from major or secondary highways.	<b>Consistent.</b> The Project would include one driveway access along Stoner Avenue and rear loading area.
3. Maximizing retail and commercial service uses along street level frontages of commercial developments.	<b>Consistent.</b> Commercial uses would be located on the ground level fronting both Santa Monica Boulevard.
4. Providing front pedestrian entrances for businesses fronting on main commercial streets.	<b>Consistent.</b> Pedestrian access into the Project would be provided along Santa Monica Boulevard, Stoner Avenue, and Granville Avenue.
5. Providing through arcades from the front of buildings to rear parking for projects within wide frontages.	<b>Consistent.</b> Pedestrian access from the front would lead pedestrians to the interior of the Project Site and also the parking area.
6. Providing landscaping strips between driveways and walkways which access the rear of properties.	<b>Consistent.</b> Pedestrian access would be provided around the Site along Santa Monica, Stoner, and Granville.
7. Providing speed bumps for driveways paralleling walkways for more than 50 feet.	<b>Not Applicable.</b> There would be no driveways parallel to walkways for more than 50 feet.
8. Providing where feasible, the under grounding of new utility service.	<b>Consistent.</b> Where feasible, utility equipment would be placed underground, screened from public view, or incorporated into the design of the Project.
9. Screening of mechanical and electrical equipment from public view.	<b>Consistent.</b> Mechanical and electrical equipment would be placed underground, screened from public view, or incorporated into the design of the Project.
10. Screening of all rooftop equipment and building appurtenances from public view.	<b>Consistent.</b> Rooftop utility equipment would be screened from public view or aesthetically incorporated into the design of the Project.
11. Requiring the enclosure of trash areas for all projects.	<b>Consistent.</b> Trash bins and collection areas would be screened from public view or aesthetically incorporated into the design of the Project.
<b>Commercial (Parking Structures)</b>	
1. Designing parking structure exteriors to match the style, materials and color of the main building(s).	<b>Consistent.</b> Parking would be located within the building and would not be visible.
2. Landscaping to screen parking structures not architecturally integrated with the main	<b>Consistent.</b> Parking would be located within the building and would not be visible.



Objective and Policies	Discussion
building(s).	
3. Utilizing decorative walls and landscaping to buffer residential uses from parking structures.	<b>Consistent.</b> Parking would be located within the building and would not be visible.
<b>Commercial (Surface Parking Landscaping)</b>	
1. Devoting 7% of total surface area of surface parking lots to landscaping.	<b>Not Applicable.</b> All parking would be located within the building.
2. Providing a landscaped buffer along public streets or adjoining residential uses.	<b>Not Applicable.</b> All parking would be located within the building.
<b>Commercial (Light and Glare)</b>	
1. Installing on-site lighting along all pedestrian walkways and vehicular access ways.	<b>Consistent.</b> Adequate lighting would be provided to provide safe lighting for pedestrian paths and vehicular access ways.
2. Directing on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	<b>Consistent.</b> On-site lighting would be directed onto driveways and walkways and directed away from residential adjacent uses.
<b>Commercial (Mixed Use)</b>	
Maximize commercial uses on the ground floor by requiring 10% of commercial development to serve needs of the residential portion of the building.	<b>Consistent.</b> Commercial uses would be located on the ground floor of the Project and could provide uses that would serve Project residents.
<b>Multiple Residential (Site Planning)</b>	
1. Providing a pedestrian entrance at the front of each project.	<b>Consistent.</b> Pedestrian access to the Project would be provided via entrances along Santa Monica Boulevard, Stoner Avenue, and Granville Avenue.
2. Requiring useable open space for outdoor activities, especially for children.	<b>Consistent.</b> The Project would provide amenities such as courtyards, pool, seating areas, and landscaping which would be usable for people of all ages.
<b>Multiple Residential (Design)</b>	
1. Requiring the use of articulations, recesses, surface perforations and/or porticos to break up long, flat building facades.	<b>Consistent.</b> The Project would be designed in a modern architectural style, with articulated building facades to provide visual interest. The use of these different materials, with variations in color and orientation, provide a rich texture to the buildings, enhancing a modern approach, and also serve to break up building facades. Large glass windows and walls would be visible along Santa Monica, while the sides of the buildings along Stoner and Granville would have smaller window slits.
2. Utilizing complementary building materials on building facades.	<b>Consistent.</b> The design of the Project would be consistent throughout the proposed buildings. The Project would be designed in a modern architectural style, with articulated building facades to provide visual interest.
3. Incorporating varying design to provide definition for each floor.	<b>Consistent.</b> The Project would be designed in a modern architectural style, with articulated building facades to provide visual interest. The use of different materials, with variations in color and orientation, provide a texture to the buildings, and also

Objective and Policies	Discussion
	serve to break up building facades.
4. Integrate building fixtures, awnings, or security gates, into the design of building(s).	<b>Consistent.</b> Any provided security features would be incorporated into the design of the building.
5. Screening of all roof top equipment and building appurtenances from view.	<b>Consistent.</b> Rooftop equipment would be screened from public view or aesthetically incorporated into the design of the Project.
6. Requiring decorative masonry walls to enclose trash.	<b>Consistent.</b> Trash bins and collection areas would be screened from public view or aesthetically incorporated into the design of the Project.
<b>Multiple Residential (Parking Structures)</b>	
1. Designing parking structure exteriors to match the style, materials and color of the main building.	<b>Consistent.</b> The Project's parking would be located within the building.
2. Landscaping to screen parking structures not architecturally integrated with the main building(s).	<b>Consistent.</b> The Project's parking would be located within the building.
3. Utilizing decorative walls and/or landscaping to buffer residential uses from parking structures.	<b>Consistent.</b> There are no adjoining residential uses and the Project's parking would be located within the building.
<p>Source: West Los Angeles Community Plan, pages III-2 to III-8, and V-1 to V-4: <a href="http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf">http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf</a></p> <p>Table: CAJA Environmental Services, December 2016.</p>	

## 11. MINERAL RESOURCES

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

**No Impact.** A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification and are unavailable for extraction.<sup>146</sup>

MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.<sup>147</sup> Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 City designated major oil drilling areas. The nearest one is #18 Sawtelle Oil Field, a broad swath of land generally around the Veterans Administration land.<sup>148</sup> The California Department of Conservation has online mapping of wells. No oil wells exist on the Project Site.<sup>149</sup> Therefore, no impacts to mineral resources of regional or statewide significance will occur.

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

**No Impact.** A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future

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<sup>146</sup> City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, February 20, 2016.

<sup>147</sup> City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, February 20, 2016.

<sup>148</sup> City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, February 20, 2016.

<sup>149</sup> State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: <http://maps.conservation.ca.gov/doggr/#>, February 20, 2016.

locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction.

The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Site is surrounded by dense urban uses and residential uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

## 12. NOISE

The section is based in part on the following item, included as Appendix B of this IS/MND:

**B** Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, May 2016.

- a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less Than Significant Impact with Mitigation Incorporated.** Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 3.12-1 provides examples of A-weighted noise levels from common sources.

**Table 3.12-1  
A-Weighted Decibel Scale**

Typical A-Weighted Sound Levels	Sound Level (dBA, $L_{eq}$ )
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
<i>Source: United States Occupational Safety &amp; Health Administration, Noise and Hearing Conservation Technical Manual, 1999.</i>	

### Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level ( $L_{eq}$ ).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. when background ambient noise levels are higher. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from

7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.

- **Equivalent Noise Level.**  $L_{eq}$  is the average noise level on an energy basis for any specific time period. The  $L_{eq}$  for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound.  $L_{eq}$  can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

## **Effects of Noise**

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

## **Audible Noise Changes**

Small perceptible changes in sound levels for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level for a hard surface of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, an unobstructed visual path between noise source and receptor. Barriers such as walls or buildings that break line-of-sight between sources and receivers can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA or more. However, if barriers are not high or long enough to break line-of-sight from sources to receivers, their effectiveness can be greatly reduced.

## **Regulatory Setting**

### ***Federal***

Federal noise standards do not regulate environmental noise associated with short-term construction or long-term operation of development projects.

### State

The State of California's 2003 General Plan Guidelines establish county and city guidelines for acceptable exterior noise levels based on land use. These standards and criteria are incorporated into the land-use planning process to reduce future noise and land-use incompatibilities. Table 3.12-2 illustrates State guidelines on considering the compatibilities between various land uses and outdoor noise levels.

**Table 3.12-2  
Land Use Compatibility for Community Noise Environments**

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
						CU		
Residential – Multi-Family	NA							
		CA						
					NU			
						CU		
Transient Lodging – Motels, Hotels	NA							
		CA						
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
		CA						
					NU			
							CU	
Auditoriums, Concert Halls, Amphitheaters		CA						
					CU			
Sports Arenas, Outdoor Spectator Sports		CA						
					CU			
Playgrounds, Neighborhood Parks	NA							
				NU				
						CU		
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
				NU				
							CU	
Office Buildings, Business Commercial and Professional	NA							
				CA				
						NU		

Industrial, Manufacturing, Utilities, Agriculture	NA					
				CA		
					NU	

*NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*  
*CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.*  
*NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*  
*CU = Clearly Unacceptable - New construction or development should generally not be undertaken.*  
*Source: California Office of Noise Control, Department of Health Services.*

## City of Los Angeles

### Construction Noise Standards

The City of Los Angeles Municipal Code (LAMC) establishes noise regulations for both short-term construction activities and long-term project operations. The LAMC regulates noise from any powered equipment or powered hand tool in a residential zone (or within 500 feet) at a distance of 50 feet between 7:00 a.m. and 10:00 p.m. to:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 horse-power or less intended for infrequent use in residential areas; including chain saws, log chippers and powered hand tools;
- 65 dBA for powered equipment intended for repetitive use in residential areas; including lawn mowers, backpack blowers, small lawn and garden tools.<sup>150</sup>

However, these noise limits do not apply where compliance is deemed technically infeasible. Specifically, such activities are allowed when it can be demonstrated that compliance is not possible “despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.”<sup>151</sup>

<sup>150</sup> City of Los Angeles, *Municipal Code Chapter XI-Noise Regulation (Section 112.05)*, 1986.

<sup>151</sup> *Ibid.*



Section 41.40 of the LAMC prohibits construction activity from occurring between 9:00 p.m. and 7:00 a.m. Monday through Friday, and before 8 a.m. and after 6 p.m. on Saturday and national holidays.<sup>152</sup> Construction is prohibited on Sunday. This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempt from these standards.

The City released the L.A. CEQA Thresholds Guide in 2006 to provide further guidance determining the significance of noise impacts. According to the Guide, a project's construction noise levels would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than ten days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.<sup>153</sup>

Additionally, a project would, under normal circumstances, have a significant impact on community noise levels if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories recommended by the land-use compatibility guidelines set forth in the State of California’s 2003 General Plan; or
- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.<sup>154</sup>

#### *Operation Noise Standards*

LAMC Chapter XI, “Noise Regulation,” regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment use, or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, they do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact

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<sup>152</sup> *City of Los Angeles, Municipal Code Chapter IV-Public Welfare (Section 41.40), 1984.*

<sup>153</sup> *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

<sup>154</sup> *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

noise standards vary depending on the type of noise source, but allowable noise levels are generally determined relative to existing ambient noise levels at affected locations. According to LAMC Chapter XI, ambient noise is “the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured,” and that “ambient noise shall be averaged over a period of at least 15 minutes...”<sup>155</sup> Table 3.12-3 summarizes minimum ambient noise levels for various land uses. In the event that ambient levels at a subject location are lower than that provided in the table, the level in the table shall be assumed.

**Table 3.12-3**  
**City Of Los Angeles Minimum Ambient Noise Levels**

Zone	Allowable Average Noise Level ( $L_{eq}$ )	
	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)
M2 and M3	65 dB(A)	65 dB(A)
<i>Source: City of Los Angeles Municipal Code, Section 111.03, 1982</i>		

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used.<sup>156</sup> The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dBA.
- For repeated impulsive noise – reduce allowable noise level by 5 dBA.
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 a.m. and 10:00 p.m. – increase allowable noise level by 5 dBA.

<sup>155</sup> City of Los Angeles, Municipal Code Chapter XI. Section 111.01.

<sup>156</sup> The City’s noise ordinance does not define the length of time over which an average noise level should be assessed. However, based on the noted reference to “60 consecutive minutes,” it is concluded that the one-hour  $L_{eq}$  metric should be used. Regarding the location at which the noise measurements should be taken, the LAMC states that “except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized.”

Additionally, the LAMC states that a noise level increase of 5 dBA or more over the existing average ambient noise level at an adjacent property line is considered a noise violation.<sup>157</sup> This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas, and motor vehicles driven onsite. The LAMC also prohibits use of air conditioning, refrigeration, heating, pumping, or filtering equipment that increases ambient noise levels by 5 dBA or more.<sup>158</sup> It also limits noise increases from motor driven vehicles on private property to no more than 5 dBA at adjacent residential properties.<sup>159</sup> Finally, between 10:00 p.m. and 7:00 a.m. the City prohibits the loading or unloading of vehicles, or use of dollies, carts, forklifts, or other wheeled equipment that causes any impulsive sound and/or raucous or unnecessary noise within 200 feet of any residential building.<sup>160</sup>

The L.A. CEQA Thresholds Guide states that a project's operations would normally have a significant impact if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories recommended by the land-use compatibility guidelines set forth in the State of California’s 2003 General Plan; or
- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.<sup>161</sup>

### **Construction Noise Impacts**

During demolition, construction, ground clearing, grading, structural, and other Project phases, noise-generating activities could occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m., and between 8 a.m. and 6 p.m. on Saturday in accordance with the LAMC. Table 3.12-4 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential buildings, institutional land-uses, and commercial land-uses. Of these, there are a number of nearby sensitive receptors to the Project site, including:

- Granville Avenue Residences: multi-family residential land-uses located up to 20 feet south of the Project site.

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<sup>157</sup> City of Los Angeles, *Municipal Code Chapter XI-Noise Regulation (Section 112.04)*, 1986.

<sup>158</sup> City of Los Angeles, *Municipal Code Chapter XI-Noise Regulation (Section 112.02)*, 1982.

<sup>159</sup> *Ibid.*

<sup>160</sup> City of Los Angeles, *Municipal Code Chapter XI-Noise Regulation (Section 112.03)*, 1982

<sup>161</sup> City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006, page I.2-3.

- Stoner Avenue Residences: multi-family residential land-uses located up to 20 feet south of the Project site.
- University High School: a public high school located approximately 290 feet north of the Project site.

To ascertain ambient noise levels at these receptors, DKA Planning took short-term, 15-minute noise readings using a Quest Technologies SoundPro DL Sound Level Meter.<sup>162</sup> At all receptors, ambient noise levels were primarily a product of motor vehicles traveling on adjacent roadways, including Santa Monica Boulevard, Granville Avenue, Stoner Avenue, and Ohio Avenue. As shown in Table 3.12-4, ambient noise levels ranged from 59.0 dBA  $L_{eq}$  at Stoner Avenue Residences and Granville Avenue Residences to 65.6 dBA  $L_{eq}$  at University High School.

Construction activities would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries.

For this analysis, construction noise impacts were modeled using the noise reference levels of equipment to be operated during the Project's grading phase, specifically excavators. These machines can produce up to 85 dBA of noise at a reference distance of 50 feet.<sup>163</sup> Other construction phases would not utilize equipment as loud as those required for site grading activities. Therefore, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction phases would not exceed those analyzed here.

**Table 3.12-4**  
**Construction Noise Levels - Unmitigated**

<b>Sensitive Receptor</b>	<b>Distance from Site (feet)</b>	<b>Maximum Construction Noise Level (dBA)</b>	<b>Existing Ambient (dBA, <math>L_{eq}</math>)</b>	<b>New Ambient (dBA, <math>L_{eq}</math>)</b>	<b>Increase</b>
Granville Avenue Residences	20	81.0	59.0	81.0	22.0
Stoner Avenue Residences	20	81.0	59.0	81.0	22.0
University High School	290	57.8	65.6	66.3	0.7

*Source: DKA Planning, 2016.*

<sup>162</sup> The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Measurements were taken on 9/15/2014.

<sup>163</sup> Federal Highway Administration. Construction Noise Handbook, 2006.

Given the ambient conditions in the Project area and the proximity of receptors, significant noise impacts could occur at two of the three Project receptors during construction of the Project:

- Granville Avenue Residences are projected to experience noise levels of 81.0 dBA, an increase of 22.0 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.
- Stoner Avenue Residences are projected to experience noise levels of 81.0 dBA, as well, an increase of 22.0 dBA. These elevated noise levels would also exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.
- Additionally, construction noise levels would exceed the City's 75 dBA limit for powered construction equipment within 500 feet of residential zones.

These on-site construction-related noise impacts would be considered significant but mitigable. **Mitigation Measures 12-1 through 12-6** are recommended to reduce incremental increases in noise levels and limit construction noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, haul trucks would export approximately 50,000 cubic yards of demolished and cut materials from the Project site over the course of various Project phases, the most intensive of which would be grading. This phase is tentatively scheduled to occur between February 27, 2017, and April 24, 2017, and would necessitate a maximum of 120 haul trips per day. These trips would transport cut materials to a farm in Moorpark, Ventura County, via a haul route that could expose roadway-adjacent receptors to noise from heavy-duty hauling vehicles. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses.

According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those road's traffic volumes, let alone augment their traffic to levels capable of producing 5.0 dBA increases. Given the Project's projected 120 maximum daily haul trips and the LAMC's limit on construction activities to between the hours of 7:00 a.m. and 9:00 p.m. Monday to Friday and between 8 a.m. and 6 p.m. on Saturday, haul truck deployment is not likely to exceed an average of more than 10 trips per hour during any of the Project's hauling phases. This increase in traffic would produce negligible noise increases along all potential haul route segments. And in any case, the haul route would access the 405 Freeway via Santa Monica Boulevard, a busy arterial with limited roadside sensitive receptors. As a result, off-site construction noise impacts related to haul trucks would be less than significant.

The Project would comply with the following requirements of the City:

***Regulatory Compliance Measures***

**RCM-12-1      Demolition, Grading, and Construction Activities**

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

***Mitigation Measures***

- MM-12-1**      Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- MM-12-2**      All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance. On-site power generators shall either be plug-in electric or solar powered.
- MM-12-3**      All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.
- MM-12-4**      Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- MM-12-5**      Temporary sound barriers shall be installed as specified:
- A temporary sound barrier no less than 12 feet in height shall be erected to block line-of-sight noise travel from the Project Site's south (alley), west (Granville) and east (Stoner) boundaries to Granville Avenue Residences and Stoner Avenue Residences. This barrier should be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side should

be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should extend along the western, southern, and eastern boundaries of the Project site that face these receptors in order to prevent on-site construction noise from diffracting around its ends.

- At the Project's northern boundary parallel to Santa Monica Boulevard, temporary noise barriers no less than 7 feet in height shall be erected to prevent Project construction operations from exceeding LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.

**MM-12-6** When operating at or near surface grade, excavators shall maintain the greatest setback feasible from the Project Site's southern boundary nearest to Granville Avenue Receptors and Stoner Avenue Receptors.

### ***Impacts After Mitigation***

As shown in Table 3.12-5, implementation of **Mitigation Measures MM-12-1** through **MM-12-5** would greatly minimize noise increases at all receptors and would reduce construction noise to below LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones. Granville Avenue Residences and Stoner Avenue Residences would still be projected to experience noise levels 0.5 dBA above the L.A. CEQA Thresholds Guide's 5.0 dBA limit for construction noise increases. However, the application of **Mitigation Measure MM-12-6** would further mitigate the Project's construction noise impacts by greater than this remaining 0.5 dBA. Predominantly, noise from excavators are a result of their engine and hydraulic pumps sounds. By requiring these machines to operate from the greatest setback feasible from the Project Site's southern boundary to Granville Avenue Residences and Stoner Avenue Residences, **Mitigation Measure MM-12-6** would ensure that their impacts be limited to below 5.0 dBA. As a result, the Project's mitigated construction noise impacts would be considered less than significant.

Given the Project's own height, some construction activities would occur at levels above the temporary sound barriers required by **Mitigation Measure MM-12-5**, thus negating their abilities to block line-of-sight noise travel from Project to receptors in these instances. However, construction activities at these heights would predominantly involve hand-held tools, pneumatic devices, and other smaller types of equipment that produce considerably less noise than heavy-duty construction vehicles that operate on the ground. As a result, these specific construction noise impacts would be less than significant.

**Table 3.12-5**  
**Construction Noise Levels - Mitigated**

<b>Sensitive Receptor</b>	<b>Distance from Site (feet)</b>	<b>Maximum Construction Noise Level (dBA)</b>	<b>Existing Ambient (dBA, <math>L_{eq}</math>)</b>	<b>New Ambient (dBA, <math>L_{eq}</math>)</b>	<b>Increase</b>
Granville Avenue Residences	20	63.0	59.0	64.0	<5.0
Stoner Avenue Residences	20	63.0	59.0	64.0	<5.0

**Table 3.12-5**  
**Construction Noise Levels - Mitigated**

<b>Sensitive Receptor</b>	<b>Distance from Site (feet)</b>	<b>Maximum Construction Noise Level (dBA)</b>	<b>Existing Ambient (dBA, L<sub>eq</sub>)</b>	<b>New Ambient (dBA, L<sub>eq</sub>)</b>	<b>Increase</b>
University High School	290	54.8	65.6	65.9	0.3
<i>Source: DKA Planning, 2016.</i>					

### **Operational Phase Noise Impacts**

During project operations, the development would produce direct noise impacts on the site from residential, restaurant, and commercial activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include:

Mechanical Equipment: Stationary noises associated with building operations, such as ground-level heating, ventilation, and air conditioning (HVAC) systems, would generate noise levels between 50 and 65 dBA at 50 feet.<sup>164</sup> Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. Based on the distance from the Project site to nearby receptors, ambient noise levels, intervening site features, and the relatively quiet operation of HVAC systems, these on-site noise sources would be incapable of causing the ambient noise levels of affected uses to increase by 3 dBA CNEL to or within their appropriate L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" land use compatibility categories, or by 5 dBA or greater overall.

Landscape Maintenance: Lawnmowers and leaf blowers generate about 70 dBA at 5 feet of distance from the source. Because sound levels decrease by 6 dBA or more for each doubling of distance from a point noise source, these temporary activities would cause short-term increases in noise that would not result in sustained increases in ambient noise levels of 5 dBA or more. The Project would comply with LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), which applies to lawn mowers, backpack blowers, small lawn and garden tools and riding tractors

Residential Land Uses: Noise from recurrent activities (e.g., conversation, consumer electronics) or non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noise.

Auto-Related Activities: Operational noises related to the proposed onsite parking would include intermittent noise events, such as door slamming and vehicle engine start-ups. These activities generally

<sup>164</sup> Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.



produce 60-70 dBA at 50 feet of distance. However, these noise events are infrequent and do not significantly increase ambient noise levels. Given that the Project parking would be subterranean and within the building, it is unlikely that these noises would even exceed the previous land-use's auto-related noises, as the site formally operated as a car dealership and auto-service center. As a result, nearby receptors could experience a net decrease in these types of operational noises.

These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be considered less than significant. The majority of the Project's operational noise impacts would be from indirect noise impacts associated with its 1,006 net new daily vehicle trips.<sup>165</sup> The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled with FHWA TNM 2.5, comparing an existing year (2016) no project scenario to existing year (2016) with project scenarios. As shown in Table 3.12-6, the greatest project-related noise increase would be 0.5 dBA along northbound Westgate Avenue to Santa Monica Boulevard during the AM peak hour. This and all other increases would be inaudible, far below the 5 dBA increase necessary to be considered noticeable by the public at large. Mobile noise generated by the Project would also not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA CNEL to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. As a result, these inaudible, off-site vehicular noise impacts would be considered less than significant. Operational noise impacts would be less than significant, and no mitigation measures are required.

**Table 3.12-6**  
**Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2016)	With Project (2016)	Project Change	Significant Impact?
N/B Westgate Ave. to Santa Monica Blvd.	AM	59.1	59.5	0.5	No
	PM	58.9	59.3	0.4	No
S/B Westgate Ave. from Santa Monica Blvd.	AM	58.7	58.9	0.2	No
	PM	58.9	59.1	0.2	No
E/B Nebraska to Barrington Ave.	AM	58.7	58.8	0.1	No
	PM	61.7	62.0	0.3	No
W/B Nebraska from Barrington Ave.	AM	57.9	58.0	0.1	No
	PM	60.1	60.3	0.2	No
<i>Source: DKA Planning, 2016.</i>					

<sup>165</sup> Overland Traffic Consultants, Inc., Traffic Impact Analysis for a Mixed Use Project, April 2016.

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

**Less Than Significant Impact.** Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

**Vibration Definitions**

Peak particle velocity (PPV) is defined as the maximum instantaneous peak of a vibration signal; it is usually measured in inches per second. PPV can be used to describe vibration impacts to buildings and humans.<sup>166</sup>

***Effects of Vibration***

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

***Perceptible Vibration Changes***

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.<sup>167</sup> Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

***Applicable Regulations***

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-

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<sup>166</sup> California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*, September 2013.

<sup>167</sup> California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*, September 2013.

borne vibration levels of 0.5 inches per second without experiencing structural damage.<sup>168</sup> In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, Caltrans' adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to Project construction. Table 3.12-7 identifies Caltrans' building damage significance thresholds. The City of Los Angeles has not adopted any thresholds associated with land-use disruption caused by ground-borne vibration.

**Table 3.12-7**  
**Building Damage Vibration Thresholds**

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
<i>Source: California Department of Transportation, 2013.</i>		

### *Construction Vibration Impacts*

Ground-borne vibration would be generated by a number of on-site construction activities. As shown in Table 3.12-8, as a result of auger drilling, bulldozing, and other tractor-type equipment operations, vibration velocities of up to 0.111 inches per second PPV are projected to occur at Granville Avenue Residences and Stoner Avenue Residences, the nearest off-site sensitive receptors. These vibration intensities are far below the 0.3 inches per second PPV threshold that is considered potentially harmful to older residential structures. As shown in Table 3.12-8, University High School would experience even lower peak vibration velocities. Other potential construction equipment and activities would produce less vibration and have reduced impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be considered less than significant.

<sup>168</sup> California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*, September 2013.

The Project could also generate vibration from the hauling of cut and demolished materials. This could increase vibration levels at receptors along haul route roadways. However, any annoyance to residential or other sensitive land uses along these routes would be temporary and minor, especially given the Project's projected estimated peak deployment of only 10 haul trucks per hour. Vibration impacts from haul trucks would be considered less than significant.

**Table 3.12-8  
Vibration Velocities at Off-Site Sensitive Uses from Project Construction**

<b>Off-Site Structures</b>	<b>Distance to Project Site (ft.)</b>	<b>Estimated PPV (in/sec)</b>	<b>Structural Significance Threshold (in/sec)</b>	<b>Significant?</b>
Granville Avenue Residences	20	0.111	0.3	No
Stoner Avenue Residences	20	0.111	0.3	No
University High School	360	0.006	0.5	No
<i>Source: DKA Planning 2016.</i>				

### **Operational Vibration Impacts**

During operation of the Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby land uses and other sensitive receptors during long-term operations to vibration levels far below levels associated with land-use disruption and would be considered less than significant.

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

**Less Than Significant Impact.** The majority of any long-term noise impacts would come from traffic traveling to and from the Project Site. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's incremental contribution to permanent off-site ambient noise levels along local roads would be minimal. As shown in Table 3.12-9, off-site noise generated by Project-related traffic would be negligible in both the AM and PM peak hours, respectively, when compared to year 2019 projected traffic volumes. The maximum projected noise increase in either period is only 0.2 dBA, along Westgate Avenue to Santa Monica Boulevard in the PM peak hour. The Project's individual and cumulative mobile source noise impacts would be considered less than significant.

**Table 3.12-9  
Future Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2019)	With Project (2019)	Project Change	Significant Impact?
N/B Westgate Ave. to Santa Monica Blvd.	AM	62.6	62.6	0.0	No
	PM	62.7	62.9	0.2	No
S/B Westgate Ave. from Santa Monica Blvd.	AM	62.1	62.1	0.0	No
	PM	62.8	62.9	0.1	No
E/B Nebraska to Barrington Ave.	AM	60.0	60.1	0.1	No
	PM	62.5	62.5	0.0	No
W/B Nebraska from Barrington Ave.	AM	59.2	59.2	0.0	No
	PM	61.2	61.3	0.1	No
Source: DKA Planning, 2016.					

**d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant Impact with Mitigation Incorporated.** As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors, particularly at residences near the Project Site. Moreover, any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. However, the related projects are located further than the sensitive receptors analyzed above, and intervening urban uses break the line of sight. The related projects would also be subject to regulatory compliance and possible mitigation measures to reduce noise. In addition, given the relatively high ambient noise levels of the Project area, it is unlikely that construction noise from concurrent developments would be audible at Project receptors, let alone contribute to cumulatively considerable noise increases. Persistent traffic noise from Santa Monica Boulevard would largely mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would obstruct these sounds' line-of-sight travel. Nevertheless, Project construction itself would have significant but mitigable noise impacts.

With regard to off-site construction noise from haul trucks, the Project itself would have less than significant impacts. Given the Project's location with direct access along Santa Monica Boulevard to the I-405 freeway, its haul route would not be expected to intersect with haul routes of other projects along roadways with numerous roadside sensitive receptors. As a result, any cumulative off-site haul truck noise impacts would be less than significant.

**Mitigation Measures 12-1** through **12-6** would reduce the Project's own noise impacts from on-Site construction activity. With these measures in place, the Project's construction noise impacts would be considered less than significant.

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

**No Impact.** The Project is not within an airport hazard area.<sup>169</sup> The Project Site is not located within two miles of a public airport. The nearest airport is Santa Monica Airport located approximately 1.65 miles south. Although the Project is within two miles of the Santa Monica Airport, there are substantial and varied land uses and other urban infrastructure (including the I-10 Santa Monica Freeway) between the airport and the Site to ensure that there would be no excessive noise levels from airport activities. As such, the Project would not expose future residents or employees to excessive airport-related noise levels.

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The Project Site is not in the vicinity of a private airstrip. As a result, the Project will not expose future residents or employees to excessive noise levels from any private airstrip.

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<sup>169</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

### 13. POPULATION AND HOUSING

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

**Less Than Significant Impact.** A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

#### ***Construction Impacts***

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

#### ***Operational Impacts***

Population generation is shown in Table 3.13-1 and employee generation is shown in Table 3.13-2. It is estimated that the Project would generate approximately 433 residents and approximately 41 employees. The population estimate is conservatively based on the average household size Citywide, which includes all types and sizes of housing. Given most of the units are studio and 1-bedroom units, the population would be well within this estimate. Moreover, some Project occupants may relocate from other parts of the West Los Angeles area or the City of Los Angeles and would not be net additions to the City's population. Therefore, this analysis is conservative.

**Table 3.13-1  
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
<b>Project</b>			
Residential	154 DU	2.81 person / DU	433
<b>Total Increase in Population</b>			<b>433</b>
<i>Note: DU = dwelling unit</i> <i>Source: The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: <a href="http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf">http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf</a>.</i> <i>Table: CAJA Environmental Services, January 2017.</i>			

**Table 3.13-2  
Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees
<b>Project</b>			
Retail	9,106 sf	369 sf / employee	25
Restaurant	6,011 sf	388 sf / employee	16
<b>Total Increase in Employees</b>			<b>41</b>
<i>Note: sf = square feet</i> <i>Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11. Retail is Neighborhood Shopping Centers rate.</i> <i>The Justification Study does not provide restaurant rates. Restaurant is based on Employee Density Study Summary Report, October 2001, Prepared for SCAG.</i> <i>Table: CAJA Environmental Services, January 2017.</i>			

The November 2016 unemployment rate in Los Angeles-Long Beach-Glendale area is approximately 4.8 percent.<sup>170</sup> Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs, rather the jobs could be filled by workers already counted within the Los Angeles area. The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase as compared to existing levels. The Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Thus, it does not represent a substantial or significant growth as compared to the existing characteristics. The Project would result in no direct impact to population and housing and a less than significant impact to employee growth.

### **Localized Growth Forecasts**

The following tables provide different geographic scales of population and housing, from the community plan and citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

Table 3.13-3 Population and Households in the City of Los Angeles, lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2035.

Table 3.13-4 shows the Southern California Association of Governments' (SCAG) planned growth of the City of Los Angeles in population, housing, and employment from 2014 to 2035.<sup>171</sup>

<sup>170</sup> Bureau of Labor Statistics: [http://www.bls.gov/eag/eag.ca\\_losangeles\\_md.htm](http://www.bls.gov/eag/eag.ca_losangeles_md.htm)

<sup>171</sup> The 2014 data was from a May 2015 report and profile. The 2035 projection was from the 2016 RTP adopted April 2016.



Table 3.13-5, Population and Households in the West Los Angeles Community Plan Area, provides data from the WLA CP, adopted in 1999, and the more recent 2014 Growth and Infrastructure Report.

**Table 3.13-3**  
**Population and Households in the City of Los Angeles**

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2016	4,030,904	1,453,271	2.77
2035	4,442,500	1,618,900	2.74
<b>Change 2010 to 2016</b>			
Number Changed	+238,283	+41,265	+0.08
<b>Change 2016 to 2035</b>			
Number Changed	+411,596	+165,629	-0.03
2010: Census data, reported 4/1/2010.			
2016: As of January 1, 2016, Department of Finance: <a href="http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php">http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php</a> .			
2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: <a href="http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf">http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf</a> .			
Table: CAJA Environmental Services, May 2016.			

**Table 3.13-4**  
**SCAG Population, Housing and Employment of the City of Los Angeles**

	Population	Housing (units)	Employment (jobs)
2014	3,904,657	1,432,553	1,753,559
2035	4,442,500	1,618,900	2,104,100
Change (2014-2035)	+537,843	+186,347	+350,541
2014: SCAG Local Profile for City of Los Angeles, dated May 2015: <a href="http://www.scag.ca.gov/Documents/LosAngeles.pdf">http://www.scag.ca.gov/Documents/LosAngeles.pdf</a>			
2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: <a href="http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf">http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf</a> .			
Table: CAJA Environmental Services, May 2016.			

**Table 3.13-5**  
**Population and Housing Units in the West Los Angeles Community Plan Area**

	2010 (Projection)	2010 Census	2014 Estimate	Change 2010-2014
Population	83,331	74,952	77,271	+ 2,319
Housing Units	42,877	38,501	38,738	+ 237

**Table 3.13-5  
Population and Housing Units in the West Los Angeles Community Plan Area**

	2010 (Projection)	2010 Census	2014 Estimate	Change 2010-2014
<i>2010 Projection from 1999: West Los Angeles Community Plan, <a href="http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf">http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf</a>. This has been superseded by 2010 Census data.</i> <i>2010 Census: Census data, reported 4/1/2010.</i> <i>2014 Estimate: City Planning Dept, Demographics Research Unit, Population/Housing Estimate, July 1, 2014.</i> <i>Table: CAJA Environmental Services, April 2016.</i>				

### *Housing Element*

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.<sup>172</sup> The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period and is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.<sup>173</sup> The Housing Element has identified 629 sites (268.6 acres) in the West Los Angeles Community Plan Area as having the housing capacity for 10,862 net units.<sup>174</sup> The Project Site is identified as a potential site for housing.<sup>175</sup> The Project would add 187 residential units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.<sup>176</sup> Thus, the Project would contribute toward the City and Community Plan's RHNA allocation.

### *Infrastructure Impacts*

The Project Site is currently developed with buildings and is located within an urbanized area in the City served by existing infrastructure. Thus, the construction of potential growth-inducing roadway or other

<sup>172</sup> City of Los Angeles, Housing Element, 2013-2021: <https://sites.google.com/site/lahousingelement/>

<sup>173</sup> City of Los Angeles, Housing Element, 2013-2021: <https://sites.google.com/site/lahousingelement/>

<sup>174</sup> City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.

<sup>175</sup> <http://planning.lacity.org/HousingInitiatives/HousingElement/Text/H.pdf>

<sup>176</sup> City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by the existing infrastructure such as roadways, impacts will be less than significant.

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

**No Impact.** A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

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

**No Impact.** A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

## 14. PUBLIC SERVICES

This section is based on the following letters, included as Appendix F of this IS/MND:

**F-1** Response from Los Angeles Fire Department, March 28, 2016.

**F-2** Response from Los Angeles Unified School District, March 22, 2016.

**F-3** Response from Los Angeles Department of Recreation and Parks, March 15, 2016.

**F-4** Response from Los Angeles Public Library, March 11, 2016.

**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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:**

**i) Fire protection?**

**Less Than Significant Impact.** A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between commercial land use<sup>177</sup> and a LAFD station that houses an engine company<sup>178</sup> is 1.0 mile and a station that houses a truck company<sup>179</sup> is 1.5 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.<sup>180</sup> The Project Site is served by several fire stations, as shown in Table 3.14-1, Fire Stations.

The City of Santa Monica operates Fire Station 3 at 1302 19<sup>th</sup> Street, approximately 1.8 miles away. Through a mutual aid agreement, the LAFD can call upon the SMF for aid.

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<sup>177</sup> *The LAFD has indicated that the Site's required fire flow is 6,000 to 9,000 gallons, which corresponds to Industrial and Commercial. The response distance is also more restrictive. If the high density residential and commercial neighborhood land use is used, it would correspond to a fire flow rate is 4,000 gallons and the response distance would increase to 1.5 miles for an engine company and 2 miles for a truck company.*

<sup>178</sup> *LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: <http://lafd.org/about/apparatus>*

<sup>179</sup> *LAFD: Aerial Ladder Fire Engines: <http://lafd.org/about/apparatus>*

<sup>180</sup> *[http://codes.iccsafe.org/app/book/content/PDF/2014/2014\\_LA\\_City\\_Fire/Fire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf](http://codes.iccsafe.org/app/book/content/PDF/2014/2014_LA_City_Fire/Fire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf)*

**Table 3.14-1  
Fire Stations**

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
59	11505 Olympic Boulevard	1.2 miles	Assessment Engine Paramedic Ambulance EMS Battalion Captain Rehab Air Tender	Non-EMS: 5:21 min. EMS: 5:32 min	Non-EMS: 249 EMS: 1,113
37	1090 Veteran Avenue	1.7 miles	Engine Assessment Light Force Paramedic Ambulance	Non-EMS: 4:51 min. EMS: 5:35 min.	Non-EMS: 418 EMS: 1,707
19	12229 Sunset Boulevard	2 miles	Engine Paramedic Ambulance Brush Patrol	Non-EMS: 6:20 min. EMS: 6:03 min.	Non-EMS: 266 EMS: 799

*Incident counts: year 2016 (January to April). Non-EMS is fire emergency. EMS is emergency medical service.*

*Response Time: year 2016 (January to April) average time (turnout time + travel time) in the station area.*

*Response time listed above does not include call processing, which averages 1:02 minutes citywide in 2016. Call processing is done at a central location and does not differ by fire stations.*

*Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS2 unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their PPE3 and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.*

*Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.*

*Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.*

[http://lafd.org/sites/default/files/pdf\\_files/11-03-2014\\_AllStations.pdf](http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf)

*Task Force: Truck company and two fire engines.*

[LAFD March 2014 Fire Station Directory.](#)

*Table: CAJA Environmental Services, April 2016.*

### ***Response Distance***

The Project Site is located within the distance identified by the Fire Code. There is a station with an engine with 1.2 miles and a station with a truck (from a task force within 1.7 miles). Additionally, the Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby. Impacts related to response distance would be less than significant.

### ***Emergency Access***

The routes from the fire stations to the Project Site would likely pass through several of the study intersections. The future (2019) traffic conditions with the Project show that none of the study intersections would have a significant impact after mitigation measures.<sup>181</sup> All circulation would be in compliance with the Fire Code, including any access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

### ***Fire Flow***

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the zoning of the area, type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing.<sup>182</sup> The fire flow is set at 6,000 to 9,000 gpm.<sup>183</sup> The following fire hydrants are near the Site.<sup>184</sup>

- Hydrant (ID 30843, size 2½ x 4D, 12-inch main) on southwest corner of Santa Monica and Granville.
- Hydrant (ID 43087, size 2½ x 4D, 6-inch main) on west side of Granville.
- Hydrant (ID 30844, size 2½ x 4D, 12-inch main) on southwest corner of Santa Monica and Stoner.

The fire main and hydrant locations will be analyzed at the plan check phase. **Regulatory Compliance Measures RCM-14-1** and **RCM-14-2** would ensure that fire protection services are adequate within the proposed buildings and around the Project Site. These measures allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment. Impacts would be less than significant.

### ***Regulatory Compliance Measures***

#### **RCM-14-1      Fire Water Flows**

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<sup>181</sup> *Traffic Impact Analysis*, Overland Traffic Consultants, April 2016.

<sup>182</sup> LAMC Sec. 57.09.06, Fire Flow: [http://lafd.org/prevention/hydrants/division\\_9\\_fc.html](http://lafd.org/prevention/hydrants/division_9_fc.html), January 27, 2014.

<sup>183</sup> LAFD response, March 28, 2016.

<sup>184</sup> Navigate LA, DWP (Fire Hydrants) Layer: <http://navigatela.lacity.org/navigatela/>

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP..

#### **RCM-14-2      Public Services (Fire)**

The Project shall comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit.

#### **ii)      Police protection?**

**Less Than Significant with Mitigation Incorporated.** A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire communities.<sup>185</sup>

The West Los Angeles Community Police Station, located at 1663 Butler Avenue, is approximately 0.5 miles (driving distance) southeast from the Project Site. The boundaries of the West Los Angeles Area are as follows: Mulholland Drive to the north; Los Angeles City boundary, I-10 Freeway to the South; Los Angeles City boundary, La Cienega Boulevard to the east; and Los Angeles City boundary to the west. Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 852 which has an area as follows: Santa Monica Boulevard to the north; Nebraska Avenue to the south; Federal Avenue to the east; and Brockton Avenue to the west.

#### **Deployment**

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate,

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<sup>185</sup> LAPD, West Bureau: [http://www.lapdonline.org/west\\_bureau](http://www.lapdonline.org/west_bureau)

percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call.

### Crime Rate

Crime statistics (Part 1 violent and property crimes) are shown in Table 3.14-2, Crime Statistics. The crime rate, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the LAPD to some extent.

**Table 3.14-2  
Crime Statistics**

Type of Crime	West Los Angeles	Citywide
Homicide	1	131
Rape	40	800
Robbery	84	4,766
Aggravated Assault	120	7,295
Burglary	411	7,226
Motor Vehicle Theft	224	8,601
Burglary Theft from Vehicle	768	14,528
Personal/Other Theft	856	14,803
<b>Total (Part 1 Crimes)</b>	<b>2,506</b>	<b>58,152</b>
<i>Year-to-date: June 25, 2016</i> <i>West LA: <a href="http://assets.lapdonline.org/assets/pdf/wlaprof.pdf">http://assets.lapdonline.org/assets/pdf/wlaprof.pdf</a></i> <i>Citywide: <a href="http://assets.lapdonline.org/assets/pdf/cityprof.pdf">http://assets.lapdonline.org/assets/pdf/cityprof.pdf</a></i> <i>Table: CAJA Environmental Services, June 2016.</i>		

### Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious.

The Project Site is not shielded from access by any adjacent uses. All sides will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which



would serve to minimize the need for LAPD services (see **Mitigation Measure MM-14-1**). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This is especially important since the Project Site is located along Santa Monica Boulevard. This measure would reduce potential construction impacts on police protection services to less than significant.

### ***Operational Impacts***

The Project would increase the number of residents and employees at the Site, as well as an increase in visitors and patrons, especially over the evening hours due to the residential and commercial uses. As such, the Project could potentially increase in the number of police service calls due to an increase in onsite persons. The potential for crime can be reduced with site specific designs and features (see **Mitigation Measure MM14-2**). The Project will include standard security measures such as adequate security lighting, secure access to non-public areas and separate commercial access points. Parking would continue to be provided on site and would be in a parking structure integrated into the building. The LAPD will require that the commanding officer of the West Los Angeles Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response (see **Mitigation Measure MM14-3**). The Project will not require the construction of a new or expanded police station. **Mitigation Measures MM-14-1, MM-14-2, and MM-14-3** will reduce the impacts associated with police services to less than significant.

### ***Mitigation Measures***

#### **MM-14-1      Public Services (Police – Demolition/Construction Sites)**

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

#### **MM-14-2      Public Services (Police)**

The plans shall incorporate a design that references the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

**MM-14-3**      Upon completion of the Project, the West Los Angeles Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

## iii) Schools?

**Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:<sup>186</sup>

- Brockton Elementary School (K-5), located at 1309 Armacost Avenue
- Webster Middle School (6-8), located at 11330 Graham Place
- University High School (9-12), located at 11800 Texas Avenue

**Enrollment Capacities**

Each of the schools' enrollments and capacities are shown in Table 3.14-3. There are no anticipated new schools planned for the area.

**Table 3.14-3**  
**LAUSD Schools Enrollments and Capacities**

Name	Current Capacity <sup>1</sup>	Resident Enrollment <sup>2</sup>	Actual Enrollment <sup>3</sup>	Current Overage/ (Shortage) <sup>4</sup>	Overcrowded Now? <sup>5</sup>	Projected Capacity <sup>6</sup>	Projected Enrollment <sup>7</sup>	Future Overage/ (Shortage) <sup>8</sup>	Overcrowding Future? <sup>9</sup>
Brockton Elementary	311	266	256	45	No	275	298	(23)	Yes
Webster Middle ^	587	661	527	(74)	Yes	1,087	732	355	No
University High	1,843	1,540	1,818	393	No	1,631	1,502	129	No

*Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2013-2014. Current and projected data are updated annually and become available after February 1st of each calendar.*

<sup>1</sup> School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

<sup>2</sup> The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

<sup>3</sup> The number of students actually attending the school now, including magnet students.

<sup>4</sup> Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

<sup>5</sup> Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist:

-A school is currently on a multi-track calendar.

-There is currently a seating shortage.

-There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats.

<sup>6</sup> School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes

<sup>186</sup> LAUSD response, March 22, 2016. Included in Appendices.

**Table 3.14-3  
LAUSD Schools Enrollments and Capacities**

Name	Current Capacity <sup>1</sup>	Resident Enrollment <sup>2</sup>	Actual Enrollment <sup>3</sup>	Current Overage/ (Shortage) <sup>4</sup>	Overcrowded Now? <sup>5</sup>	Projected Capacity <sup>6</sup>	Projected Enrollment <sup>7</sup>	Future Overage/ (Shortage) <sup>8</sup>	Overcrowding Future? <sup>9</sup>
<p>capacity for magnet programs.</p> <p><sup>7</sup> Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.</p> <p><sup>8</sup> Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment).</p> <p><sup>9</sup> Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:  -A school remains on a multi-track calendar.  -There is a seating shortage in the future.  -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.</p> <p><sup>1</sup>Current capacity shown for QEIA (Quality Education Investment Act) schools includes class-size reduction due to QEIA. Excludes capacity used by charter co-locations. Projected capacity excludes class-size reduction due to QEIA.</p> <p>Source: Written response from Rena Perez, LAUSD, March 22, 2016. Included in the Appendices.</p> <p>Table by CAJA Environmental Services, April 2016.</p>									

As shown on Table 3.14-4, the Project (directly through its residential units and indirectly through its employees) would generate an increase of approximately 68 elementary, 17 middle, and 34 high school students, for a total increase of approximately 119 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD.

Brockton Elementary is projected to have 23 seats shortage in the future (LAUSD considers a seating overage of less than or equal to a safety margin of 30 seats to be considered overcrowded). Webster Middle is considered overcrowded now but will have adequate capacity in the future (LAUSD uses a 5 year estimate). University High has adequate capacity now and in the future to accommodate the Project. However, as discussed below, payment of required school fees is deemed to provide full and complete mitigation.

**Table 3.14-4  
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential units	154	62	15	31	108
Employees	41	6	2	3	11
<b>Total</b>		<b>68</b>	<b>17</b>	<b>34</b>	<b>119</b>
<p>Residential land uses: Elementary: 0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household</p> <p>Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used.</p>					

**Table 3.14-4  
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
<i>Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.</i>					
<i>Table: CAJA Environmental Services, January 2017.</i>					

### ***Proximity to Schools***

The Project Site is in close proximity to several schools, the nearest being University High School, located approximately 275 feet north. University High and other nearby schools (Brockton Avenue Elementary and Saint Sebastian School are 1,100 feet and 1,600 feet away respectively) would be generally shielded from the Project Site by intervening residential and commercial buildings to the north. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Therefore, no impact would occur.

### ***School Fees***

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.

**iv) Parks?**

**Less Than Significant Impact.** A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The West Los Angeles Community Plan Area has a ratio of 0.77 acres or parkland per 1,000 persons.<sup>187</sup>

Table 3.14-5, Parks and Recreation Centers lists the parks and recreation centers that are located nearby the Project Site. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site. The LADRP does not have current plans for construction or expansion of parks and recreational facilities that have a two mile service radius within a two mile radius of the Project Site.<sup>188</sup>

**Table 3.14-5  
Parks and Recreation Centers**

<b>Name</b>	<b>Address</b>	<b>Acres</b>
<b>Pocket Park (less than one acre and with one-half mile radius of the Site)</b>		
Bundy Triangle	1500 S Bundy Drive	0.22
<b>Neighborhood Park (between one and 10 acres and with one mile radius of the Site)</b>		
Mahood Multipurpose Center	11388 Santa Monica Blvd	4.32
<b>Community Park (between 10 and 50 acres and with two mile radius of the Site)</b>		
Barrington Recreation Center	333 Barrington Avenue	18.64
Stoner Recreation Center	1835 Stoner Avenue	8.66
Westwood Park	1350 Sepulveda Blvd	26.70
<i>NavigateLA with Recreation and Parks Department layer: <a href="http://navigateLA.lacity.org/index01.cfm">http://navigateLA.lacity.org/index01.cfm</a>  Source: LADRP response, March 15, 2016. Included in the Appendices.  Table: CAJA Environmental Services, April 2016. </i>		

The Project would increase the number of residents and employees at the Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include open space, a pool, a clubhouse room, and fitness room. The amount of open space required is 21,450 square

<sup>187</sup> Written response from LADRP, March 15, 2016.

<sup>188</sup> Written response from LADRP, March 15, 2016.

feet. There would be approximately 22,348 square feet of open space provided, which exceeds the required amount. There is also plaza and miscellaneous courts as additional open space. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable Project residents would use nearby parks and recreation facilities. However, with payment of applicable fees, impacts would be less than significant.

According to the standards provided in the Public Recreation Plan, the 433 net new residents would require 1.7 acres to maintain the standard of four acres per 1,000 people. The City requires developers to dedicate parkland or pay applicable fees (such as dwelling unit construction tax) in lieu of parkland dedication. Therefore, with payment of fees per the following regulatory compliance measure, impacts to parks and recreation centers from the Project would be less than significant.

#### **Recreation (Increased Demand for Parks or Recreational Facilities)**

**RCM-14-3** If the applicant seeks a certificate of occupancy for apartments, then the following applies: (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

#### **v) Other public facilities?**

**Less Than significant Impact.** A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.<sup>189</sup> On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population, 14,500 square feet for community with more than 45,000 population, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. Table 3.14-6 describes the libraries that would serve the Project.

The Project would increase the number of residents and employees at the Project Site, which would increase the use of and demand for materials. However, the Project would not directly necessitate the need for a new facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. Employees of retail developments do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

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<sup>189</sup> LAPL website: <http://www.lapl.org/about-lapl/press/2012-library-facts>

The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations<sup>190,191,192</sup>. Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

**Table 3.14-6**  
**Los Angeles Public Libraries**

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Brentwood Branch	11820 San Vicente	10,400	46,946 / 114,945	39,026	7.5
West LA Regional	11360 Santa Monica	13,740	46,387 / 73,035	108,580	13.0
Westwood Branch	1246 Glendon	12,500	67,807 / 209,375	32,211	10.0
Palms-Rancho Branch	2920 Overhead	10,500	55,074 / 212,971	65,731	10.5
<i>Staffing is full-time equivalent. Current Service – 2010 Census.</i> <i>The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.</i> <i>Source: Written response from LAPL, March 11, 2016. Included in the Appendices.</i> <i>Table: CAJA Environmental Services, April 2016.</i>					

<sup>190</sup> “To Read or Not To Read”, see pg. 10: “Literary reading declined significantly in a period of rising Internet use”: <http://www.nea.gov/research/toread.pdf>.

<sup>191</sup> “How and Why Are Libraries Changing?” Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

<sup>192</sup> “Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies”, Carol Tenopir: <http://www.clir.org/pubs/reports/pub120/contents.html>.

## 15. RECREATION

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

**Less Than Significant Impact.** A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents and employees at the Project Site by 433 residents and 40 employees. Employees of retail do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under Section 14.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees (identified as a regulatory compliance measure will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees (identified as a regulatory compliance measure) will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.



## 16. TRANSPORTATION AND TRAFFIC

This section is based on the following report and letter, included as Appendix G of this IS/MND:

- G-1** Traffic Impact Analysis for Mixed-Use Project, Overland Traffic Consultants, Inc., August 2016.
  - G-2** LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, November 17, 2016.
  - G-3** Modification of Project Description, Overland Traffic Consultants, Inc., December 21, 2016.
  - G-4** LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, February 1, 2017.
- a)** **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Less Than Significant with Mitigation Incorporated.** A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

### Study Scope

The traffic impact analysis has been conducted using the procedures adopted by the City of Los Angeles Department of Transportation (LADOT) West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) and LADOT Traffic Study Guidelines, August 2014 to analyze the potential traffic impacts of new development projects. The seventeen study intersections were evaluated using the LADOT Critical Movement Analysis (CMA) method. The CMA method calculates the operating conditions of each individual study intersection using a ratio of peak hour traffic volume to the intersection's capacity. Any change to the intersection's peak hour operating condition caused by an increase/decrease in traffic volume can be quantified (i.e. traffic impact) using this analysis method. Potential traffic impacts caused by a development project that exceeds limits established by the City of Los Angeles WLA TIMP as specified in Specific Plan adopted in March 8, 1997 are identified. Any potentially significantly impacted intersections are then evaluated for possible traffic mitigation measures. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the existing and future traffic volume estimate:

- Traffic counts were conducted on May 21, 2014 and October 21, 2014 increased by 1% per year ambient growth to 2016;
- Traffic in (a) + the net Project traffic (existing + Project);

- Traffic in (b) + proposed traffic mitigation, if necessary
- Existing + ambient growth to 2019 (added additional 1% per year);
- Traffic in (d) + related projects (future “without Project” scenario);
- Traffic in (e) with the proposed Project traffic (future “with Project” scenario);
- Traffic in (f) + the proposed traffic mitigation, if necessary.

A CMA analysis of the existing and future traffic conditions has been completed at those locations (intersections and local street segments) expected to have the highest potential for significant traffic impacts. Morning and evening peak hour conditions have been evaluated at seventeen (17) key intersections. Local street segment analysis has been conducted along two street segments with 24-hour (daily) data collected. The first of the intersections is along the boundary of the City of Santa Monica and City of Los Angeles. The remaining intersections are fully within the City of Los Angeles. The intersections analyzed in this study are:

- Centinela Avenue and Santa Monica Boulevard (boundary intersection at City of Santa Monica and City of Los Angeles);
- Bundy Drive and Wilshire Boulevard (City of Los Angeles);
- Bundy Drive and Santa Monica Boulevard (City of Los Angeles);
- Bundy Drive and Idaho Avenue (City of Los Angeles);
- Bundy Drive and Olympic Boulevard (City of Los Angeles);
- Westgate Avenue and Wilshire Boulevard (City of Los Angeles);
- Westgate Avenue and Santa Monica Boulevard (City of Los Angeles);
- Barrington Avenue and Wilshire Boulevard (City of Los Angeles);
- Barrington Avenue and Texas Avenue (City of Los Angeles);
- Barrington Avenue and Ohio Avenue (City of Los Angeles);
- Barrington Avenue and Santa Monica Boulevard (City of Los Angeles);
- Barrington Avenue and Nebraska Avenue (City of Los Angeles);
- Barrington Avenue and Olympic Boulevard (City of Los Angeles);

- Federal Avenue and Santa Monica Boulevard (City of Los Angeles);
- Santa Monica Blvd. and Beloit Avenue/Southbound I-405 Freeway Ramps (City of Los Angeles);
- Santa Monica Blvd. and Cotner Avenue/Northbound I-405 Freeway Ramps (City of Los Angeles); and;
- Olympic Boulevard and Sawtelle Boulevard (City of Los Angeles).

The roadway segments analyzed are:

- Granville Avenue, between Santa Monica Boulevard and Idaho Avenue; and
- Ohio Avenue, between Granville Avenue and Stoner Avenue.

### **Existing Transportation Facilities Setting**

Figure 3 (in Traffic Impact Study, Overland Traffic Consultants, June 2016, included in the appendices) illustrates the study locations, type of intersection traffic control and lane configurations for the Project impact analysis.

The Project is in the West Los Angeles area of Los Angeles which is serviced by the San Diego Freeway (I-405) and the Santa Monica Freeway (I-10). The regional north-south I-405 freeway is located to east of the Project. The San Diego Freeway is accessible from the project area via Santa Monica Boulevard. The freeway is approximately three quarters of a mile east of the Project site. The San Diego Freeway (I-405) carries approximately 330,000 vehicles per day (VPD) with 23,000 vehicles per hour (VPH) near Santa Monica Boulevard during peak periods. The Santa Monica Freeway (I-10) is an east-west freeway located south of the project site. The Santa Monica Freeway is accessible from the project area via Bundy Drive, Centinela Avenue and Pico Boulevard west of Centinela Avenue.

The I-10 freeway is located approximately one and one quarter miles south of the Project Site and carries approximately 260,000 VPD with 19,900 VPH near Bundy Drive during the peak periods. The I-405 and I-10 freeways link to numerous other freeways in the vicinity providing extensive regional access.

Barrington Avenue is a north-south roadway designated as an Avenue II in the Mobility Plan 2035. One to two lanes in each direction are provided in the Project area.

Bundy Drive is a north-south roadway designated as a Collector Street north of Wilshire Boulevard and an Avenue I south of Wilshire Boulevard in the Mobility Plan 2035. Two lanes in each direction are provided in the Project area.

Federal Avenue is a north-south roadway designated as a Collector Street from Wilshire Boulevard to Idaho Avenue and as a local street south of Idaho Avenue to Pico Boulevard in the in the Mobility Plan 2035. One lane in each direction is provided at Santa Monica Boulevard.

Idaho Avenue is an east-west roadway designated as a Collector Street in the Mobility Plan 2035. West of Centinela Avenue, Idaho Avenue is within the City of Santa Monica jurisdiction and changes name to Colorado Avenue. One lane in each direction is provided in the Project area.

Nebraska Avenue is an east-west roadway designated as a Collector Street between Beloit Street and Centinela Avenue in the Mobility Plan 2035. West of Centinela Avenue, Nebraska Avenue is within the City of Santa Monica jurisdiction and terminates at Stewart Street. One lane in each direction is provided in the Project area.

Ohio Avenue is an east-west roadway designated as a Collector Street between Barrington Avenue and Sepulveda Boulevard and as a Local Street westerly in the Mobility Plan 2035. West of Centinela Avenue, Ohio Avenue is within the City of Santa Monica jurisdiction and changes name to Broadway. One lane in each direction is provided in the Project area.

Sawtelle Boulevard is a north-south roadway designated as a Collector Street between Olympic Boulevard and Ohio Avenue and as an Avenue I south of Olympic Boulevard in the Mobility Plan 2035.

Texas Avenue is an east-west roadway designated as a Collector Street between Federal Avenue and Centinela Avenue in the Mobility Plan 2035. West of Centinela Avenue, Texas Avenue is within the City of Santa Monica jurisdiction and changes name to Arizona Avenue. One lane in each direction is provided in the Project area.

Olympic Boulevard is an east-west roadway designated as a Boulevard II in the Mobility Plan 2035. West of Centinela Avenue, Olympic Boulevard is within the City of Santa Monica jurisdiction. Three lanes in each direction are provided in the Project area.

Santa Monica Boulevard is an east-west roadway designated as a Boulevard II in the in the Mobility Plan 2035. West of Centinela Avenue, Santa Monica Boulevard is within the City of Santa Monica jurisdiction. Three lanes in each direction are provided in the Project area during peak hours.

Westgate Avenue is a north-south roadway designated as a Collector Street between Wilshire Boulevard and La Grange Avenue and as a local street from La Grange Avenue to Mississippi Avenue in the Mobility Plan 2035. One lane in each direction is provided in the project area.

Wilshire Boulevard is an east-west roadway designated as a Boulevard II in the Mobility Plan 2035. West of Centinela Avenue, Wilshire Boulevard is within the City of Santa Monica jurisdiction. Two lanes in each direction are provided in the Project area during peak hours for commuter with one lane in each direction for the exclusive use of buses. The Wilshire Bus Rapid Transit Project Phase II has been completed. This project provides for a bus only lane on the north and south curbs of the street through the project area.

### **Project Traffic Generation**

Traffic-generating characteristics of many land uses including the existing vehicle sales and proposed residential apartments, retail and restaurant uses have been surveyed by the Institute of Transportation Engineers (ITE). The results of the traffic generation studies have been published in a handbook titled Trip Generation, 9th Edition. This publication of traffic generation data has become the industry standard for estimating traffic generation for different land uses. The Project is within the WLA TIMP Specific Plan area. Trip generation during the PM Peak Hours has been specifically developed for the Specific Plan area and is used in this analysis to generate PM Peak Hour trips. The ITE Trip Generation Manual and WLA TIMP indicate that the use and the size associated with the Project and existing uses generally exhibit the trip-making characteristics as shown by the trip rates in Table 3.16-1, Traffic Generation Rates.

**Table 3.16-1  
Trip Generation Rates**

ITE Code	Description	Daily Traffic	AM Peak Hour			PM Peak Hour *		
			Total	In	Out	Total	In	Out
220	Apartment	6.65	0.51	20%	80%	0.62	65%	35%
820	Retail (other) <sup>1</sup>	42.7	0.96	62%	38%	9.60	48%	52%
826	Specialty Retail <sup>2</sup>	44.32	1.33	62%	38%	5.00	44%	56%
841	Automobile Sales	32.3	1.92	75%	25%	2.62	40%	60%
931	Quality Restaurant	89.95	0.81	55%	45%	7.39	67%	33%
932	High Turnover Restaurant	127.15	10.81	55%	45%	12.92	60%	40%

*Rates is per unit for apartment and per 1,000 sf for all other.*

<sup>1</sup>Daily & AM based on Shopping Center Rates, PM trips based on WLA TIMP Trip Generation Table Appendix A - Other Retail Category. Other retail includes high trip generators such as yogurt and specialty retail shops, video rental, dry cleaning, etc.

<sup>2</sup>AM rates not available - SANDAG Rates used, PM trips based on WLA TIMP Appendix A. Specialty retail includes low trip generators such as jewelry shops, art supply stores, quality apparel stores, etc.

\* All PM Peak Hour trip generation is based on the WLA TIMP rather than ITE, which is required LADOT methodology in the WLA TIMP area.

Table 1 in Traffic Impact Study, Overland Traffic Consultants, August 2016.

Table: CAJA Environmental Services, January 2017.

The trip generation rates are general in application and are established without regard for the nature of a specific project's vicinity in terms of transit and walking or interaction with the traffic on the surrounding roadways. Considering the Metro Rapid, Big Blue Bus and other transit opportunities in the area (i.e., the newly opened Metro Expo Light Rail Line at Exposition Boulevard and Bundy Drive), walkability and expanding cycling infrastructure in the City and the Project site's vicinity, it is anticipated that employees and patrons of the retail component and apartment residents will make use of these options instead of single occupant vehicles. The Project is within 375 feet of the Metro Rapid Stop at Barrington Avenue and Santa Monica Boulevard. A transit trip reduction was estimated as 15% for the residential, restaurant and retail components of the Project as permitted by LADOT in their Traffic Study Guidelines.

It is likely that there will be interaction between the land uses where residential tenants will make use of the retail components of the Project and patrons of the retail components will have a meal or visit more than one venue. ITE Recommended Practices, March 2001 indicate internal trip reductions on mixed use projects such as the proposed Project from 15 to 38%. As approved by LADOT, the internal trip reduction for the ground floor retail component was conservatively estimated at 5%. Many land uses are visited on the way to or from another main destination point. The greater the regional draw the lower the pass-by activities. LADOT has established passby credits for several land uses and are published in their August 2014 Traffic Study Policies and Procedures. The pass-by rates were developed from references in the ITE Recommended Practices, March 2001. The larger and renowned venues are most likely to be main destination points. The LADOT policy for a large retail center (600,000 square feet or more) and for Specialty Retail is a pass-by reduction of 10%. A small retail center of 50,000 square feet or less is permitted a 50% pass-by reduction. Quality restaurants are permitted a 10% pass-by reduction and high turnover restaurants are permitted a 20% pass-by reduction. A 10% pass-by reduction was incorporated into the analysis for all the retail (conservatively including the “other retail” which could be as high as 50%) and quality restaurants. A 20% pass-by reduction was taken for the high turnover restaurant. The pass-by reductions are not taken at the nearby intersection of Santa Monica Boulevard and Westgate Avenue because the drivers may need to make turning movements at the intersection to access the site’s parking. It is estimated that the Project will conservatively generate a net increase of 1,006 daily trips with 60 trips during the AM peak hour and 113 trips during the PM peak hour after credits for the existing car sales, internal trips, transit/walk trips and pass-by trips. Table 3.16-2a displays the estimated Project trip generation.

**Table 3.16-2a**  
**Estimated Project Traffic Generation**

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed Project								
Apartment	187 units	1,244	95	19	76	92	62	30
-Transit/Walk Trips*	15%	(187)	(14)	(3)	(11)	(14)	(9)	(5)
Subtotal		1,057	81	16	65	78	53	26
Other Retail	6,995 sf	299	7	4	3	67	32	35
-Transit/Walk Trips*	15%	(45)	(1)	(1)	(0)	(10)	(5)	(5)
-Internal Trips	5%	(13)	(0)	(0)	(0)	(3)	(1)	(2)
-Pass-By	10%	(24)	(1)	(0)	(1)	(5)	(3)	(2)
Subtotal		217	5	3	2	49	23	26
Specialty Retail	1,857 sf	82	2	1	1	9	4	5
-Transit/Walk Trips*	15%	(12)	(0)	(0)	(0)	(1)	(0)	(1)
-Internal Trips	5%	(3)	(0)	(0)	(0)	(0)	(0)	(0)
-Pass-By	10%	(7)	(0)	(0)	(0)	(1)	(1)	(0)
Subtotal		60	2	1	1	7	3	4
Quality Restaurant	4,033 sf	363	3	2	1	30	20	10
-Transit/Walk Trips*	15%	(54)	(0)	(0)	(0)	(4)	(3)	(1)
-Internal Trips	5%	(15)	(0)	(0)	(0)	(1)	(1)	(0)

-Pass-By Subtotal	10%	(29) 264	(0) 3	(0) 2	(0) 1	(2) 23	(1) 15	(1) 8
High Turnover Restaurant	2,024 sf	257	22	12	10	26	16	10
-Transit/Walk Trips*	15%	(39)	(3)	(2)	(1)	(4)	(2)	(2)
-Internal Trips	5%	(11)	(1)	(1)	(0)	(1)	(1)	(0)
-Pass-By Subtotal	20%	(42) 166	(4) 14	(2) 7	(2) 7	(4) 17	(2) 11	(2) 6
<b>Proposed Total</b>		<b>1,764</b>	<b>105</b>	<b>29</b>	<b>76</b>	<b>174</b>	<b>104</b>	<b>69</b>
<b>Existing Use</b>								
Automobile Sales	24,684 sf	797	47	36	11	65	26	39
-Transit/Walk Trips*	5%	(40)	(2)	(2)	(0)	(3)	(1)	(2)
Subtotal		757	45	34	11	61	25	37
<b>Net New Project Total</b>		<b>1,006</b>	<b>60</b>	<b>(5)</b>	<b>65</b>	<b>113</b>	<b>80</b>	<b>33</b>
<p><i>*Project is within ¼ mile of Metro Rapid Line 704 at Santa Monica and Barrington Avenue.</i></p> <p><i>Table 2 in Traffic Impact Study, Overland Traffic Consultants, August 2016.</i></p> <p><i>Table: CAJA Environmental Services, January 2017.</i></p>								

### Project Modification

The traffic analysis for the Original Project in the traffic study included an evaluation of replacement of 24,684 square feet of automobile sales with construction of 187 apartment units with 14,909 square feet of commercial space including: 6,995 square feet (sf) of other retail, 1,857 sf of specialty retail, 4,033 sf of quality restaurant, and 2,024 sf of high turnover restaurant. The Project has been modified (Current Project) with a reduced number of residential units and an additional 208 sf of commercial. The Current Project proposed is the replacement of 24,684 sf of automotive sales with construction of 154 apartment units with 15,117 sf of commercial space including: 7,043 sf of other retail, 2,063 sf of specialty retail, 3,850 sf of quality restaurant and 2,161 sf of high turnover restaurant. The Current Project has 33 fewer units, 48 sf more of other retail, 206 sf more of Specialty Retail, 137 sf more of high turn-over restaurant and 183 square feet less quality restaurant. Table 3.16-2b provides a summary of the Original Project and Current Project descriptions.

A summary comparison between the Original Project and Current Project trip generation are provided in Table 3.16-2c to demonstrate the reduction in vehicle trips.

**Table 3.16-2b**  
**Original and Current Project Descriptions**

Land Use	Original	Current	Difference
Apartment	187 units	154 units	-33 units
Commercial			
Other Retail	6,995 sf	7,043 sf	+48 sf
Specialty Retail	1,857 sf	2,063 sf	+206 sf
Quality Restaurant	4,033 sf	3,850 sf	-183 sf

High Turnover Restaurant	2,204 sf	2,161 sf	+137 sf
<b>Total Commercial</b>	<b>14,909 sf</b>	<b>15,117 sf</b>	<b>+208 sf</b>
<i>Table 1 in Modification of Project Description, Overland Traffic Consultants, Inc., December 21, 2016.</i>			
<i>Table: CAJA Environmental Services, January 2017.</i>			

**Table 3.16-2c**  
**Original and Current Project Descriptions**

	<b>Daily Net Trips</b>	<b>AM Peak Hour</b>	<b>PM Peak Hour</b>
Current Project	827	46	98
Original Project	1,006	60	113
Difference	-179	-14	-15
<i>Table 2 in Modification of Project Description, Overland Traffic Consultants, Inc., December 21, 2016.</i>			
<i>Table: CAJA Environmental Services, January 2017.</i>			

### **Trip Distribution and Assignment of Project Traffic**

A primary factor affecting a Project's trip direction is the spatial distribution between destination points which would generate Project trip origins and destinations. The estimated Project directional trip distribution is also based on the study area roadway network, freeway locations, traffic flow patterns in and out of this area of the City of Los Angeles and consistency with previously approved traffic studies for this area of Los Angeles. The Project site is located along Santa Monica Boulevard which is a major east-west roadway. It is also in close proximity to the north-south major roadways of Barrington Avenue and Bundy Drive. These facilities provide good access to/from the project area. In addition, the Santa Monica Freeway is to the south and the San Diego Freeway is to the east. These freeways provide good regional access to and from potential destination points. The City of Santa Monica is west of the project site and Century City is to the east. The Santa Monica Freeway provides access to downtown Los Angeles, and the San Diego Freeway provides access to Universal City, the San Fernando Valley Westchester, Los Angeles International Airport area and the South Bay. Figure 4 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices) illustrates the estimated area wide Project traffic distribution percentages. Figure 5 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices) shows the estimated Project traffic percentages detailed at each of the selected study intersections. Using the traffic assignment at each intersection and the estimated peak hour traffic volume as provided in the Table 3.16-2, the development's peak hour traffic volumes at each study location have been calculated and are shown in Figure 6 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices). This estimated assignment of the Project traffic flow provides the information necessary to analyze the potential traffic impacts generated by the Project at the study intersections.

### **Analysis of Existing Traffic Conditions**



Traffic volume data used in the following peak hour intersectional analysis were based on traffic counts conducted by National Data Systems, an independent traffic data collection company. Traffic counts were conducted on May 21, 2014 and October 21, 2014. The traffic counts were increased by 1% per year to reflect current 2016 traffic conditions as required by LADOT for this area of the City of Los Angeles. Traffic counts were conducted on typical weekdays when there were no holidays, no rain and schools were in session. Traffic counts were conducted during the morning peak and evening peak hours. The highest single hour during each of the peak periods was used in this analysis. Existing traffic counts are provided in Figure 7 and 8 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices) for the AM and PM peak hours respectively. The traffic conditions analysis was conducted using the Critical Movement Analysis (CMA) method.

The study intersections were evaluated using this methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation for signalized intersections. The existing peak hour traffic counts were used along with intersection lane configurations and traffic controls to determine an intersection's current operating condition. The CMA procedure uses a ratio of an intersection's traffic volume to its capacity for rating an intersection's congestion level. The highest combinations of conflicting traffic volume (V) at an intersection are divided by the intersection capacity value. Intersection capacity (C) represents the maximum volume of vehicles that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions. The CMA procedure uses a ratio of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming full capacity. V/C ratios provide an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70% capacity with 30% unused capacity. Once the volume-to-capacity ratio has been calculated, operating characteristics are assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to describe the quality of traffic flow. Definitions of the LOS grades are shown in Table 3.16-3.

Reductions for traffic signal improvements in the area are included in the analysis. All studied intersections currently have Automated Traffic Surveillance and Control (ATSAC) systems improvements which increase capacity at the intersection through computer aided signal progression. The City of Los Angeles has determined that this type of improvement increases capacity by approximately 7%. The City has supplemented the signal systems in the West Los Angeles area around the Project with an upgrade which includes advance loop detection at the intersections and system wide progression computer programming with system wide interaction between the traffic signals. This system is known as the Adaptive Traffic Control System (ATCS) system. An additional 3% capacity increase is estimated with this signal system. According to LADOT, all the studied intersections have been improved with signal improvements at the study intersections with ATSAC and ATCS capabilities. The existing and future traffic conditions include ATSAC and ATCS improvements at the study intersections within the City of Los Angeles.

The West Los Angeles area has been observed to experience delays in traffic when through and turning movements are impeded by traffic stopped for upstream traffic signals. When traffic counts are taken at the study intersections, only those that make it through the intersections green cycle are counted. In order to account for the delay phenomenon at the study intersections, all of the study intersection 7% and 10% increases in capacity credits for signal improvements have been removed during the morning and afternoon peak hours. In addition, upon discussion with LADOT and in accordance with other studies conducted in the Project area, capacity was further reduced to present observed operating conditions at the following intersections:

Westgate Avenue and Wilshire Boulevard – From 1,500 Vehicles per Hour (VPH) for a two phase traffic signal to 900 VPH during the AM Peak Hour and 800 VPH during the PM Peak Hour.

Westgate Avenue and Santa Monica Boulevard – From 1,500 Vehicles per Hour (VPH) for a two phase traffic signal to 1,000 VPH during the AM Peak Hour and 900 VPH during the PM Peak Hour.

Barrington Avenue and Wilshire Boulevard – From 1,500 Vehicles per Hour (VPH) for a two phase traffic signal to 900 VPH during the AM Peak Hour and 800 VPH during the PM Peak Hour.

Barrington Avenue and Santa Monica Boulevard – From 1,500 Vehicles per Hour (VPH) for a two phase traffic signal to 1,000 VPH during the AM Peak Hour and 900 VPH during the PM Peak Hour.

Federal Avenue and Santa Monica Boulevard – From 1,500 Vehicles per Hour (VPH) for a two phase traffic signal to 1,200 VPH during the AM Peak Hour and PM Peak Hour.

Beloit Avenue/I-405 Southbound Ramps and Santa Monica Boulevard – From 1,425 Vehicles per Hour (VPH) for a three phase traffic signal to 1,200 VPH during the AM Peak Hour and PM Peak Hour.

Cotner Avenue/I-405 Northbound Ramps and Santa Monica Boulevard – From 1,425 Vehicles per Hour (VPH) for a three phase traffic signal to 1,200 VPH during the AM Peak Hour and PM Peak Hour.

**Table 3.16-3  
Level of Service Definitions**

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	At LOS A, there are no cycles that are fully loaded, and few are even close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.
B	> 0.60 – 0.70	LOS B represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted with platoons of vehicles.
C	> 0.70 – 0.80	In LOS C stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasionally drivers may have to wait through more than one red signal indication, and back-ups may develop behind turning vehicles.
D	> 0.80 – 0.90	LOS D encompasses a zone of increasing restriction, approaching instability. Delays to approaching vehicles may be substantial during short peaks within the peak period, but

**Table 3.16-3  
Level of Service Definitions**

LOS	V/C Ratio	Operating Conditions
		enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive back-ups.
E	> 0.90 – 1.00	LOS E represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00) there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).
F	> 1.00	LOS F represents jammed conditions. Back-ups from location downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable, because full utilization of the approach may be prevented by outside conditions.

*Source: Table 4, Traffic Impact Study, Overland Traffic, August 2016.*  
*Table by CAJA Environmental Services, January 2017.*

By applying the CMA procedures to the intersection data, the V/C values and the corresponding Levels of Service (LOS) for existing traffic conditions were determined at the study intersections. The LOS values for the intersections are summarized in Table 3.16-4.

**Table 3.16-4  
Level of Service for Existing Conditions**

No.	Intersection	Peak Hour	Existing 2016	
			CMA	LOS
1	Centinela Ave and Santa Monica Blvd	AM	0.763	C
		PM	0.759	C
2	Bundy Drive and Wilshire Boulevard	AM	1.111	F
		PM	1.044	F
3	Bundy Drive and Santa Monica Blvd	AM	0.731	C
		PM	0.798	C
4	Bundy Drive and Idaho Avenue	AM	0.760	C
		PM	0.789	C
5	Bundy Drive and Olympic Boulevard	AM	0.984	E
		PM	0.897	D
6	Westgate Avenue and Wilshire Boulevard	AM	0.961	E
		PM	1.050	F
7	Santa Monica Boulevard and Westgate Avenue	AM	0.841	D
		PM	0.808	D
8	Barrington Avenue and Wilshire Boulevard	AM	1.501	F
		PM	1.458	F
9	Barrington Avenue and Texas Avenue	AM	0.704	C
		PM	0.935	E
10	Barrington Avenue and Ohio Avenue	AM	0.720	C

		PM	0.706	C
11	Barrington Avenue and Santa Monica Boulevard	AM PM	1.221 1.339	F F
12	Barrington Avenue and Nebraska Avenue	AM PM	0.635 0.741	B C
13	Barrington Avenue and Olympic Boulevard	AM PM	1.066 0.886	F D
14	Federal Avenue and Santa Monica Boulevard	AM PM	0.700 0.638	B B
15	Beloit Avenue/I-405 SB Ramps/Santa Monica Boulevard	AM PM	1.090 0.956	F F
16	Cotner Avenue/I-405 NB Ramps/Santa Monica Boulevard	AM PM	0.855 0.808	D D
17	Sawtelle Boulevard and Olympic Boulevard	AM PM	1.012 0.976	F E
<i>Intersection No. 1 is on the boundary of the City of Los Angeles and City of Santa Monica.  Source: Table 5, Traffic Impact Study, Overland Traffic, August 2016.  Table by CAJA Environmental Services, January 2017.</i>				

### Analysis of Existing + Project Conditions

An evaluation has been conducted to evaluate potential Project impacts to the existing conditions. According to the standards adopted by LADOT and described in the WLA TIMP, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in Table 3.16-5.

**Table 3.16-5**  
**Significant Impact Criteria, City of Los Angeles**

LOS	Final V/C Value	Increase in V/C Value
C	0.701 – 0.800	+ 0.040
D	0.801 – 0.900	+ 0.020
E and F	> 0.901	+ 0.010 or more
<i>No significant impacts occur at LOS A or B because intersections operations are good and can accommodate additional traffic growth.  Source: Table 6, Traffic Impact Study, Overland Traffic, August 2016.  Table by CAJA Environmental Services, January 2017.</i>		

The potential impact for existing plus Project was conducted by adding the Project traffic to the existing traffic. The existing and existing + Project traffic conditions were compared to determine if the thresholds of significance in Table 3.16-5 were exceeded. As noted in Table 3.16-6, two intersections are significantly impacted when the Project's traffic generation is added to the existing conditions:

- Westgate Avenue and Wilshire Boulevard during the AM and PM Peak Hour,
- Santa Monica Boulevard and Westgate Avenue during the PM Peak Hour.

The mitigation section proposes traffic mitigation to reduce these impacts less than significance

**Table 3.16-6**  
**Traffic Conditions for Existing + Project**

No.	Intersection	Peak Hour	Existing 2016		Existing 2016 + Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Centinela Ave and Santa Monica Blvd	AM	0.763	C	0.765	C	+ 0.002	No
		PM	0.759	C	0.762	C	+ 0.003	No
2	Bundy Drive and Wilshire Boulevard	AM	1.111	F	1.113	F	+ 0.002	No
		PM	1.044	F	1.044	F	+ 0.000	No
3	Bundy Drive and Santa Monica Blvd	AM	0.731	C	0.733	C	+ 0.002	No
		PM	0.798	C	0.801	D	+ 0.003	No
4	Bundy Drive and Idaho Avenue	AM	0.760	C	0.764	C	+ 0.004	No
		PM	0.789	C	0.797	C	+ 0.008	No
5	Bundy Drive and Olympic Boulevard	AM	0.984	E	0.983	E	- 0.001	No
		PM	0.897	D	0.900	D	+ 0.003	No
6	Westgate Avenue and Wilshire Boulevard	AM	0.961	E	0.971	E	+ 0.010	<b>YES</b>
		PM	1.050	F	1.066	F	+ 0.016	<b>YES</b>
7	Santa Monica Boulevard and Westgate Avenue	AM	0.841	D	0.842	D	+ 0.001	No
		PM	0.808	D	0.834	D	+ 0.026	<b>YES</b>
8	Barrington Avenue and Wilshire Boulevard	AM	1.501	F	1.501	F	+ 0.000	No
		PM	1.458	F	1.463	F	+ 0.005	No
9	Barrington Avenue and Texas Avenue	AM	0.704	C	0.704	C	+ 0.000	No
		PM	0.935	E	0.936	E	+ 0.001	No
10	Barrington Avenue and Ohio Avenue	AM	0.720	C	0.720	C	+ 0.000	No
		PM	0.706	C	0.706	C	+ 0.000	No
11	Barrington Avenue and Santa Monica Boulevard	AM	1.221	F	1.222	F	+ 0.001	No
		PM	1.339	F	1.341	F	+ 0.002	No
12	Barrington Avenue and Nebraska Avenue	AM	0.635	B	0.645	B	+ 0.010	No
		PM	0.741	C	0.755	C	+ 0.014	No
13	Barrington Avenue and Olympic Boulevard	AM	1.066	F	1.067	F	+ 0.001	No
		PM	0.886	D	0.886	D	+ 0.000	No
14	Federal Avenue and Santa Monica Boulevard	AM	0.700	B	0.700	B	+ 0.000	No
		PM	0.638	B	0.643	B	+ 0.005	No
15	Beloit Avenue/I-405 SB Ramps/Santa Monica Boulevard	AM	1.090	F	1.090	F	+ 0.000	No
		PM	0.956	F	0.958	F	+ 0.002	No
16	Cotner Avenue/I-405 NB Ramps/Santa Monica Boulevard	AM	0.855	D	0.860	D	+ 0.005	No
		PM	0.808	D	0.810	D	+ 0.002	No
17	Sawtelle Boulevard and Olympic	AM	1.012	F	1.016	F	+ 0.004	No

	Boulevard	PM	0.976	E	0.978	E	+ 0.002	No
<p><b>Bold – significant impact.</b></p> <p><i>Intersection No. 1 is on the boundary of the City of Los Angeles and City of Santa Monica.</i></p> <p><i>Intersection #5 (Bundy &amp; Olympic) has a negative impact during the am peak hour because the net trip generation has fewer trips entering the site than the previous use and therefore has fewer northbound through trips, which creates a slightly improved operating condition.</i></p> <p><i>Intersections with +0.000 growth indicate no change to the intersection with the project related trips created by a combination of fewer trips for some time periods and/or project related trips that do not go through the intersection where the higher conflicting traffic movements are generated (critical moves).</i></p> <p><i>Source: Table 7, Traffic Impact Study, Overland Traffic, August 2016.</i></p> <p><i>Table by CAJA Environmental Services, January 2017.</i></p>								

### Analysis of Future Traffic Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments including the Project. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the future traffic volume estimate:

- (a) Existing traffic 2016 conditions;
- (b) Traffic in (a) + ambient growth (1 % per year increase) to 2019 buildout year;
- (c) Traffic in (b) + related projects (without Project scenario);
- (d) Traffic in (c) with the Project traffic (with Project scenario);
- (e) Traffic in (d) + the proposed traffic mitigation, if necessary.

The future cumulative analysis includes other reasonably foreseeable development projects located within the study area that are either under construction or brought to the attention of the City as planned for future development.

As part of this analysis, the related project information was obtained from the City of Los Angeles Department of Transportation<sup>193</sup>, City of Los Angeles Department of City Planning, and City of Santa Monica. It should be noted that this Project or any actions taken by the City regarding this Project, does not have a direct bearing on the other proposed related projects. The locations of the related projects are shown in Figure 9 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices) and described in Table 3.16-7. The number of trips added to the area by the related projects alone is in Figure 10 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices). To evaluate future traffic conditions with the related project, estimates of the peak hour trips

<sup>193</sup> Data obtained for related projects during March 2016.

generated by the related projects were developed. The potential traffic growth in the future at the study intersections has been determined by adding the existing traffic volume, ambient traffic growth of 1% per year and traffic from the other related development projects. Future cumulative “without project” peak hour traffic volume estimates are shown in Figure 11 for the AM Peak Hour and Figure 12 for the PM Peak Hour (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices).

**Table 3.16-7**  
**Related Projects Descriptions**

No.	Project	Size	Location	City
1	Supermarket improvement Existing market and retail (removed)	58,000 sf (62,266 sf)	11660 Santa Monica Boulevard	LA
2	Hotel Condominium Commercial Apartments Gas Station (removed) Other (removed)	134 rooms 10 units 19,500 sf 250 units (8 fuel pumps) (7,265 sf)	10955 Wilshire Boulevard	LA
3	Pico-Sepulveda Mixed Use Apartments Commercial Max Industrial (removed)	595 units 15,000 sf	11122 Pico Boulevard	LA
4	YMCA Recreation Center	65,000 sf	1466 Westgate Avenue	LA
5	Hudson Pacific Office re-use	250,283 sf	12333 Olympic Boulevard	LA
6	Picasso Mixed Use Residential Apartments Retail Mixed Use (Removed)	108 units 13,000 sf (22,458 sf)	12029 Wilshire Boulevard	LA
7	Martin Expo Town Center Apartments Grocery General Retail Quality Restaurant High Turnover Restaurant Fast food restaurant Creative Office Auto Dealership (removed)	516 units 45,000 sf 4,000 sf 4,000 sf 4,000 sf 10,000 sf 200,000 sf (99,399 sf)	12101 Olympic Boulevard	LA
8	Mixed Use Apartments Specialty Retail	89 units 6,030 sf	11421 Olympic Boulevard	LA
9	Apartment Restaurant Garden Nursery (removed)	52 units 3,300 sf	1900 Sawtelle Boulevard	LA
10	Retail Store	19,819 sf	11040 Pico Boulevard	LA

	Furniture and Ken Cranes (removed)			
11	Landmark Apartment Project Apartments Retail/Restaurant Commercial (removed)	376 units 5,000 sf	11750 Wilshire Boulevard	LA
12	Office Retail	49,000 sf 15,000 sf	11677 Wilshire Boulevard	LA
13	Residential Commercial	100 units 12,000 sf	3032 Wilshire Boulevard	SM
14	Commercial Retail Restaurant Residential Condominium	22,383 sf 2,700 sf 30 units	2300 Wilshire Boulevard	SM
15	Residential	30 units	3008 Santa Monica Boulevard	SM
16	Colorado Creative Studios Creative Office Neighborhood Retail	191,982 sf 9,000 sf	2834 Colorado Avenue	SM
17	Roberts Center <sup>1</sup> Residential Units Live/Work Units Retail/Restaurant	245 units 37 units 24,600 sf	2848 Colorado Avenue	SM
18	Village Trailer Park <sup>2</sup> Condominiums Condo/Apartments Apartments Specialty Retail	171 units 72 units 134 units 25,940 sf	2930 Colorado Avenue	SM
19	Mixed Use Commercial Residential Retail	174 units 18,650 sf	2041-2115 Colorado Avenue	SM
20	Retail Office	9,200 sf 35,000 sf	10700 Santa Monica Boulevard	LA
21	Apartments Retail	83 units 9,100 sf	2919-23 Wilshire Boulevard	SM
22	Residential Retail	545 units 80,000 sf	3020 Nebraska Avenue	SM
23	School	20,000 sf	1660 Steward Street	SM
24	School	115,300 sf	3131 Olympic Boulevard	SM
25	Condominiums Warehouse Retail	4 units 10,800 sf 15,250 sf	1621 Franklin Street	SM
26	School Expansion	175 students	1905 Armacost Avenue	LA
27	Condominium	45 units	1943-1959 High Place	SM
28	Edison School	65,000 sf	2425 Kansas Avenue	SM
29	Apartments Retail	260 units 3,000 sf	3402 Pico Boulevard	SM



30	Office	17,620 sf	2142 Pontius Avenue	LA
31	Condominium Retail Commercial	72 units 4,500 sf 12,425 sf	11567 Santa Monica Boulevard (estimated 50% occupied)	LA
32	School	500 students	11800 Olympic Boulevard	LA
33	Condominium Retail	16 units 17,000 sf	1940 Cloverfield Boulevard	SM
34	Apartments Retail	156 units 23,000 sf	2121 Cloverfield	SM
35	Apartments Medical office (removed)	200 units (50,000 sf)	11600 Wilshire Boulevard	LA
36	Apartments New Car Dealership	39 units 10,750 sf	11852 Santa Monica Boulevard	LA
37	Apartments Retail	150 units 40,000 sf	11800 Santa Monica Boulevard	LA
38	School Renovation	518 students	11725 Sunset Boulevard	LA
39	Increased School enrollment	265 students	12001 Sunset Boulevard	LA
40	Restaurant	2,328 sf	1073 Broxton Avenue	LA
41	Mixed-use commercial conversion to apartments	30 units	1855 Westwood Boulevard	LA
42	Restaurant	3,100 sf	2011 Westwood Boulevard	LA
43	Mixed-use Condominium Specialty retail	138 units 28,000 sf	3115 Sepulveda Boulevard	LA
44	Brentwood Town Green <sup>3</sup> Retail Restaurant Remove retail/office Remove single family homes	26,582 sf 13,556 sf (24,816 sf) (2 units)	11973 San Vicente Boulevard	LA
45	Creative office space Renovate and expand buildings	203,816 sf	1681 26 <sup>th</sup> Street	LA
46	Residential buildings Estimated # units	40 units	1519 Granville / 1518-1522 Westgate	LA
47	Residential buildings Estimated # of units	100 units	1515 Westgate	LA
Infrastructure Improvements				
48	Wilshire Bus Rapid Transit Center			
49	Exposition Transit Corridor Phase II			
LA – City of Los Angeles, SM – City of Santa Monica				
<sup>1</sup> Per Roberts Center Project EIR				
<sup>2</sup> per Village Trailer Park Recirculated EIR				
<sup>3</sup> Per Brentwood Town Green Project EIR				
Source: Table 8, Traffic Impact Study, Overland Traffic, August 2016.				

Table by CAJA Environmental Services, January 2017.

The traffic conditions created by ambient traffic growth plus the other related development projects are shown in Table 3.16-8 which demonstrates growth by comparing the existing traffic conditions and the future without Project conditions. Comparing the changes in the traffic conditions between the future without Project and future with Project provides the necessary information to determine if the Project's projected traffic increases have the potential to create a significant impact on any of the study intersections. Figure 11 displays the future traffic volumes without the project during the AM Peak Hour and Figure 12 displays the future traffic volumes without the project during the PM Peak Hour, respectively (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices).

**Table 3.16-8  
Future (2019) Traffic Conditions Without Project**

No.	Intersection	Peak Hour	Existing 2016		Future (2019) Without Project		Growth
			CMA	LOS	CMA	LOS	
1	Centinela Ave and Santa Monica Blvd	AM	0.763	C	0.887	D	+ 0.124
		PM	0.759	C	0.890	D	+ 0.131
2	Bundy Drive and Wilshire Boulevard	AM	1.111	F	1.183	F	+ 0.072
		PM	1.044	F	1.114	F	+ 0.070
3	Bundy Drive and Santa Monica Blvd	AM	0.731	C	0.796	D	+ 0.065
		PM	0.798	C	0.866	D	+ 0.095
4	Bundy Drive and Idaho Avenue	AM	0.760	C	0.855	D	+ 0.110
		PM	0.789	C	0.899	E	+ 0.145
5	Bundy Drive and Olympic Boulevard	AM	0.984	E	1.129	F	+ 0.145
		PM	0.897	D	1.035	F	+ 0.138
6	Westgate Avenue and Wilshire Boulevard	AM	0.961	E	1.051	F	+ 0.090
		PM	1.050	F	1.150	F	+ 0.100
7	Santa Monica Boulevard and Westgate Avenue	AM	0.841	D	1.084	F	+ 0.243
		PM	0.808	D	1.096	F	+ 0.288
8	Barrington Avenue and Wilshire Boulevard	AM	1.501	F	1.637	F	+ 0.136
		PM	1.458	F	1.571	F	+ 0.113
9	Barrington Avenue and Texas Avenue	AM	0.704	C	0.787	C	+ 0.083
		PM	0.935	E	1.023	F	+ 0.088
10	Barrington Avenue and Ohio Avenue	AM	0.720	C	0.798	C	+ 0.078
		PM	0.706	C	0.773	C	+ 0.067
11	Barrington Avenue and Santa Monica Boulevard	AM	1.221	F	1.348	F	+ 0.127
		PM	1.339	F	1.454	F	+ 0.115
12	Barrington Avenue and Nebraska Avenue	AM	0.635	B	0.735	C	+ 0.100
		PM	0.741	C	0.844	D	+ 0.103

13	Barrington Avenue and Olympic Boulevard	AM	1.066	F	1.185	F	+ 0.119
		PM	0.886	D	0.973	E	+ 0.087
14	Federal Avenue and Santa Monica Boulevard	AM	0.700	B	0.750	C	+ 0.050
		PM	0.638	B	0.684	B	+ 0.046
15	Beloit Avenue/I-405 SB Ramps/Santa Monica Boulevard	AM	1.090	F	1.131	F	+ 0.041
		PM	0.956	F	1.005	F	+ 0.049
16	Cotner Avenue/I-405 NB Ramps/Santa Monica Boulevard	AM	0.855	D	0.910	E	+ 0.055
		PM	0.808	D	0.847	D	+ 0.039
17	Sawtelle Boulevard and Olympic Boulevard	AM	1.012	F	1.057	F	+ 0.045
		PM	0.976	E	1.027	F	+ 0.051
<i>Intersection No. 1 is on the boundary of the City of Los Angeles and City of Santa Monica.</i>							
<i>Source: Table 9, Traffic Impact Study, Overland Traffic, August 2016.</i>							
<i>Table by CAJA Environmental Services, January 2017.</i>							

## Project Impacts

### Construction

The project developer will attempt to park and stage for construction on-site as much as possible. During portions of the construction where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will attempted to be minimized and be conducted outside of peak traffic times. Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and shuttle service to the site if needed. Therefore, impacts would be less than significant.

### Operation

Traffic conditions after completion of the Project have been calculated by adding the Project traffic volume to the future without Project traffic volume. The traffic impact of the added Project traffic at the study intersections is shown in Table 3.16-9 by comparing the future without Project and future with Project traffic conditions at the study intersections. The significant impact criteria provided in Table 3.16-5 was applied to the future traffic conditions. As shown in Table 3.16-9, significant traffic impacts occur at two study intersections:

- Westgate Avenue and Wilshire Boulevard during the AM and PM Peak Hour,
- Santa Monica Boulevard and Westgate Avenue during the PM Peak Hour.

Traffic mitigation is proposed to reduce these impacts to a level of less than significance. It should be noted that the impact analysis does not consider any changes to the existing intersection configuration (i.e., future roadway improvements by the City or other developers in the area). Future cumulative “with Project” peak hour traffic volumes are shown in Figure 13 for the AM Peak Hour and Figure 14 for the

PM Peak Hour, respectively (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices).

**Table 3.16-9  
Future (2019) Traffic Conditions With Project**

No.	Intersection	Peak Hour	Future (2019) Without Project		Future (2019) With Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Centinela Ave and Santa Monica Blvd	AM	0.887	D	0.889	D	+ 0.002	No
		PM	0.890	D	0.893	D	+ 0.003	No
2	Bundy Drive and Wilshire Boulevard	AM	1.183	F	1.185	F	+ 0.002	No
		PM	1.114	F	1.114	F	+ 0.000	No
3	Bundy Drive and Santa Monica Blvd	AM	0.796	D	0.798	D	+ 0.002	No
		PM	0.866	D	0.869	D	+ 0.003	No
4	Bundy Drive and Idaho Avenue	AM	0.855	D	0.859	D	+ 0.004	No
		PM	0.899	E	0.908	E	+ 0.009	No
5	Bundy Drive and Olympic Boulevard	AM	1.129	F	1.129	F	+ 0.000	No
		PM	1.035	F	1.037	F	+ 0.002	No
6	Westgate Avenue and Wilshire Boulevard	AM	1.051	F	1.061	F	+ 0.010	YES
		PM	1.150	F	1.166	F	+ 0.016	YES
7	Santa Monica Boulevard and Westgate Avenue	AM	1.084	F	1.091	F	+ 0.007	No
		PM	1.096	F	1.127	F	+ 0.031	YES
8	Barrington Avenue and Wilshire Boulevard	AM	1.637	F	1.637	F	+ 0.000	No
		PM	1.571	F	1.576	F	+ 0.005	No
9	Barrington Avenue and Texas Avenue	AM	0.787	C	0.787	C	+ 0.000	No
		PM	1.023	F	1.023	F	+ 0.000	No
10	Barrington Avenue and Ohio Avenue	AM	0.798	C	0.798	C	+ 0.000	No
		PM	0.773	C	0.773	C	+ 0.000	No
11	Barrington Avenue and Santa Monica Boulevard	AM	1.348	F	1.349	F	+ 0.001	No
		PM	1.454	F	1.458	F	+ 0.004	No
12	Barrington Avenue and Nebraska Avenue	AM	0.735	C	0.745	C	+ 0.010	No
		PM	0.844	D	0.859	D	+ 0.015	No
13	Barrington Avenue and Olympic Boulevard	AM	1.185	F	1.185	F	+ 0.000	No
		PM	0.973	E	0.973	E	+ 0.000	No
14	Federal Avenue and Santa Monica Boulevard	AM	0.750	C	0.750	C	+ 0.000	No
		PM	0.684	B	0.690	B	+ 0.006	No
15	Beloit Avenue/I-405 SB Ramps/Santa Monica Boulevard	AM	1.131	F	1.131	F	+ 0.000	No
		PM	1.005	F	1.005	F	+ 0.002	No
16	Cotner Avenue/I-405 NB Ramps/Santa Monica Boulevard	AM	0.910	E	0.910	E	+ 0.005	No
		PM	0.847	D	0.848	D	+ 0.001	No
17	Sawtelle Boulevard and Olympic Boulevard	AM	1.057	F	1.060	F	+ 0.003	No
		PM	1.027	F	1.030	F	+ 0.003	No
Intersection No. 1 is on the boundary of the City of Los Angeles and City of Santa Monica.								

*Intersections with +0.000 growth indicate no change to the intersection with the project related trips created by a combination of fewer trips for some time periods and/or project related trips that do not go through the intersection where the higher conflicting traffic movements are generated (critical moves).*

*Source: Table 10, Traffic Impact Study, Overland Traffic, August 2016.*

*Table by CAJA Environmental Services, January 2017.*

### Neighborhood Traffic Analysis

A local street analysis was conducted for the street segments of Granville Avenue between Santa Monica Boulevard and Idaho Avenue, and on Ohio Avenue between Granville Avenue and Stoner Avenue. Granville Avenue and Idaho Avenue are designated as a Local Street by the City of Los Angeles. Note that Westgate Avenue and Idaho Avenue are designated as collector streets by the City of Los Angeles and are therefore not subject to the segment analysis. According to LADOT Traffic Study Policies and Procedures, August 2014, commercial projects may be required to conduct residential street impact analysis. The objective of the residential street analysis is to determine the potential cut through traffic impacts on a local residential street that can result from a commercial Project. The commercial component of this Project has been used to determine the potential roadway segment impacts. The prior commercial automobile sales generated 757 daily trips after credits. The Project will generate 707 daily commercial trips after credits. There is a net reduction of 50 daily commercial trips.

Future with Project conditions along the street segments were evaluated similar to the intersection analysis. A 1% ambient growth to project completion year 2019 and related project volumes were added to the existing traffic volumes for Future without Project conditions. The Project traffic was then added to the Future without Project traffic conditions to determine the Future with Project traffic conditions. A comparison of the Future without Project and Future with Project conditions was then conducted to determine the percentage of traffic increased along the segments with the Project. LADOT and the WLA TIMP define a significant traffic impact for a residential street as shown in Table 3.16-10.

**Table 3.16-10**  
**Future Average Daily Traffic**

Volume	Project-related increase in ADT
Less than 1,000	120 trips or more
1,000 to 2,000 VPD	12% or more of final ADT
2,000 to 3,000 VPD	10% or more of final ADT
3,000 or more VPD	8% or more of final ADT
<i>VPD – vehicles per day; ADT – average daily traffic.</i> <i>Source: Table 11, Traffic Impact Study, Overland Traffic, August 2016.</i> <i>Table by CAJA Environmental Services, January 2017.</i>	

Roadway segment traffic volumes for Existing, Future without Project, and Future with Project conditions are shown in Table 3.16-11. The Project will reduce trips along the street segments and will not create any significant roadway segment impacts.

**Table 3.16-11  
Street Segment Analysis**

Volumes	Existing 2016	Future Without 2019		Future With Project 2019				Significant
		Ambient	Total	%	Trips	Total	% Impact	
Granville Avenue, between Santa Monica Boulevard and Idaho Avenue								
Northbound	442	13	446	2%	-1	445	-0.1%	
Southbound	612	18	618	2%	-1	618	0.1%	
Total	1,054	31	1,064		-2	1,063	-0.1%	No
Ohio Avenue, between Granville Avenue and Stoner Avenue								
Eastbound	1,650	49	1,666	10%	-3	1,663	-0.2%	
Westbound	1,384	41	1,398	10%	-3	1,395	-0.2%	
Total	3,034	89	3,063		-6	3,058	-0.2%	No
Source: Table 12b, Traffic Impact Study, Overland Traffic, August 2016. Table by CAJA Environmental Services, January 2017.								

## Intersection and Segment Impacts

### *Existing + Project*

Two of the 17 study intersections in the Existing + Project analysis will have a significant impact:

- AM and PM Peak Hour at Westgate Avenue and Wilshire Boulevard.
- PM Peak Hour at Santa Monica Boulevard and Westgate Avenue.

### *Future With Project*

The same two of seventeen study intersections have also been identified as significantly impacted during the Future With Project analysis:

- AM and PM Peak Hours at Westgate Avenue and Wilshire Boulevard.
- PM Peak Hour at Santa Monica Boulevard and Westgate Avenue.

## Multi-Modal Trip Reduction Improvements

(For both Existing + Project and Future with Project mitigation)

Although roadway improvements will continue to be an important strategy for providing mobility, a complete transportation mitigation plan includes measures to reduce congestion through trip reduction measures while maintaining and providing transportation mobility. Transit services near the Project provides access to local and regional facilities. There is an existing Santa Monica Big Blue Bus and Metro bus stop at Santa Monica Boulevard and Westgate Avenue approximately 375 feet from the west side of the Project and a Metro Rapid 704 stop at Santa Monica Boulevard and Barrington Avenue approximately 375 feet from the east side Project.

The Santa Monica/Granville Mixed Use project proposes to provide the following to encourage transit usage and other multi-modal commuter options:

1. Improve the existing bus stop on the northeast corner of Santa Monica Boulevard and Barrington Avenue where signs, benches and a trash receptacle are currently provided. This stop will be enhanced with a weather protected covered bench similar to the stop on the southwest corner;
2. Provide an on-site TDM manager to assist in matching rideshare partners, determining transit routes, and promoting TDM program;
3. Provide access pass and transit pass reductions for residents and employees of the commercial venues;
4. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the commercial components;
5. Provide car sharing service for residents and/or commercial employees that rideshare;
6. Provide bicycle spaces to encourage cycling as an alternative to single occupant vehicles;
7. Provide bicycle sharing service for residents and/or commercial employees use;
8. Provide some commercial components that are neighborhood serving and easily accessible and visible to the major streets to encourage walking as an alternative to single occupant vehicles;

A full Transportation Management Plan will be developed that will detail project traffic reduction measures for the commercial and residential components of the Project. The project amenities are anticipated to reduce the number of vehicles to and from the project site. Although anticipated to be higher, a 15% reduction in new project vehicle trips has been estimated to account for trip reduction measures. This is included as **Mitigation Measure MM-16-1**.

### ***Mitigation Measures***

#### **MM-16-1      Transportation Demand Management Plan**

- The Applicant shall prepare a Transportation Demand Management Plan (TDMP) and Monitoring Program (MP) pursuant to Section 4.G of the West Los Angeles

Transportation Improvement and Mitigation Specific Plan (WLA TIMP) for the development of the project. A fully detailed TDMP and MP shall be prepared by a licensed Traffic Engineer and shall be reviewed and approved by the Department of Transportation (DOT) prior to the issuance of any certificate of occupancy. All subsequent MP reporting should be prepared by a licensed Traffic Engineer and submitted annually to the LADOT West Los Angeles Planning Office for review and shall begin immediately following the issuance of any certificate of occupancy.

- The TDMP shall comply with the TDM directives of Ordinance No. 168,700 as prescribed in LAMC Section 12.26-J. The TDMP should include, but shall not be limited to, the strategies recommended in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT.
- The MP shall monitor and confirm that the project is achieving a 15 percent trip reduction target. Measurement of actual trips shall be monitored and reported to DOT as outlined in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT. Any review which determines that the mitigation target has not been achieved the project shall be subject to a non-compliance penalty as outlined in DOT's Traffic Impact Assessment dated February 1, 2017 and November 17, 2016, or as modified by DOT.

**MM-16-2      Wilshire Boulevard and Westgate Avenue**

- Design and implement the reconfiguration of the northbound intersection operation from a single lane approach to a two (2) lane approach with an exclusive left-turn lane and an exclusive right-turn lane or shared left/right-turn lane.
- Provide traffic signal operation modification and pavement restriping as needed.
- This mitigation measure may be shared with the neighboring development at 11800 Santa Monica Boulevard. In the event that the development at 11800 West Santa Monica Boulevard is not approved or delayed, the applicant for this development shall implement the above mitigation measures.

**MM-16-3      Santa Monica Boulevard and Westgate Avenue**

- Widen the east side of Westgate Avenue along the 11800 Santa Monica Boulevard project frontage, south of Santa Monica Boulevard, by approximately three feet to accommodate the proposed improvements.
- Design and implement the following reconfiguration to the north- and south-bound operations from a single lane approach to a two (2) lane approach with one left-turn lane and one shared through/right-turn lane



- Provide traffic signal operation modification and pavement restriping as needed.
- This mitigation measure may be shared with the neighboring development at 11800 Santa Monica Boulevard. In the event that the development at 11800 West Santa Monica Boulevard is not approved or delayed, the applicant for this development shall implement the above mitigation measures.

### Impacts after Mitigation

#### *Westgate Avenue and Wilshire Boulevard*

**Mitigation Measure MM-16-1** (Multi-model trip reduction measures) and **Mitigation Measure MM-16-2** (physical intersection improvement) will apply and impacts will be reduced to less than significance.

#### *Santa Monica Boulevard and Westgate Avenue*

**Mitigation Measure MM-16-1** (Multi-model trip reduction measures) and **Mitigation Measure MM-16-3** (physical intersection improvement) will apply and impacts will be reduced to less than significance.

The effectiveness of all mitigation measures is indicated in Table 3.16-12a for the study intersections.

**Table 3.16-12a**  
**Intersections with Mitigation**

No.	Intersection	Peak Hour	Existing		Existing + Project			Existing + Project With Mitigation			Significant Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
6	Westgate Avenue and Wilshire Boulevard	AM	0.961	E	0.971	E	+ 0.010	0.907	E	- 0.054	No
		PM	1.050	F	1.066	F	+ 0.016	0.988	E	- 0.062	No
7	Santa Monica Boulevard and Westgate Avenue	AM	0.841	D	0.839	D	+ 0.001	0.757	C	- 0.084	No
		PM	0.808	D	0.834	D	+ 0.026	0.737	C	- 0.071	No
No.	Intersection	Peak Hour	Future Without		Future (2019) + Project			Future (2019) + Project With Mitigation			Significant Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
6	Westgate Avenue and Wilshire Boulevard	AM	1.051	F	1.061	F	+ 0.010	0.971	F	- 0.080	No
		PM	1.150	F	1.166	F	+ 0.016	1.071	F	- 0.079	No
7	Santa Monica Boulevard and Westgate Avenue	AM	1.084	F	1.091	F	+ 0.007	0.885	D	- 0.199	No
		PM	1.096	F	1.127	F	+ 0.031	0.988	E	- 0.108	No

Source: Table 15a and 15b, Traffic Impact Study, Overland Traffic, August 2016.  
Table by CAJA Environmental Services, January 2017.

The Current Project will create 179 fewer daily trips, 14 fewer morning peak hour trips, and 15 fewer evening peak hour trips than the Original Project. The lower trip generation of the Current Project would create slightly lower impacts than the Original Project. No new project impacts would be created by this project. New Critical Movement Analysis (CMA) analysis worksheets were prepared for the two intersections that were identified as significantly impacted with the Original Project using the Current Project net trips. Trip distribution was not changed with this reanalysis because the land uses have not changed. As shown below in Table 3.16-12b, these intersections remain significantly impacted with the Project and are mitigated to a less than significant level with the proposed mitigation.

**Table 3.16-12b**  
**Intersections with Mitigation**

No.	Intersection	Peak Hour	Existing		Existing + Project			Existing + Project With Mitigation			Significant Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
6	Westgate Avenue and Wilshire Boulevard	AM	0.961	E	0.970	E	+ 0.009	0.907	E	- 0.054	No
		PM	1.050	F	1.064	F	+ 0.014	0.986	E	- 0.064	No
7	Santa Monica Boulevard and Westgate Avenue	AM	0.841	D	0.842	D	+ 0.001	0.795	C	- 0.046	No
		PM	0.808	D	0.832	D	+ 0.024	0.773	C	- 0.035	No
No.	Intersection	Peak Hour	Future Without		Future (2019) + Project			Future (2019) + Project With Mitigation			Significant Impact
			CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact	
6	Westgate Avenue and Wilshire Boulevard	AM	1.051	F	1.060	F	+ 0.009	0.971	F	- 0.080	No
		PM	1.150	F	1.164	F	+ 0.014	1.070	F	- 0.080	No
7	Santa Monica Boulevard and Westgate Avenue	AM	1.084	F	1.090	F	+ 0.006	0.935	D	- 0.149	No
		PM	1.096	F	1.123	F	+ 0.027	0.988	E	- 0.098	No

*Table 3 in Modification of Project Description, Overland Traffic Consultants, Inc., December 21, 2016.*

*Table by CAJA Environmental Services, January 2017.*

The physical improvements proposed at Westgate Avenue and Wilshire Boulevard and at Santa Monica Boulevard and Westgate Avenue will be shared with the neighboring approved project at 11800 Santa Monica Boulevard. The physical improvements create enough additional capacity to mitigate both the 11800 Santa Monica Project and this Project at 1500 Granville Avenue as indicated in Table 3.16-13.

**Table 3.16-13**  
**Intersections with Mitigation and Previous Approved Project**

No.	Intersection	Peak Hour	Existing + 1500 Granville Project with Mitigation			11800 SM Impact Prior to Mitigation	Remaining Capacity after Mitigation of Both projects	Significant Impact
			CMA	LOS	Capacity*			
6	Westgate Avenue and Wilshire	AM	0.907	E	- 0.054	n/a	n/a	No
		PM	0.988	E	- 0.062	+ 0.033	- 0.029	No

	Boulevard							
7	Santa Monica Boulevard and Westgate Avenue	AM PM	0.757 0.737	C C	- 0.084 - 0.071	n/a + 0.109	n/a 0.038	No No
No.	Intersection	Peak Hour	Future + 1500 Granville Project with Mitigation			11800 SM Impact Prior to Mitigation	Remaining Capacity after Mitigation of Both projects	Significant Impact
			CMA	LOS	Capacity*			
6	Westgate Avenue and Wilshire Boulevard	AM	0.971	E	- 0.080	+ 0.011	- 0.069	No
		PM	1.071	F	- 0.079	+ 0.030	- 0.049	No
7	Santa Monica Boulevard and Westgate Avenue	AM	0.855	D	- 0.199	+ 0.021	- 0.178	No
		PM	0.988	E	- 0.108	+ 0.109	- 0.001	No

\*Remaining Capacity after Mitigation with 1500 Granville Project.

From LADOT Review Letter to Dept of City Planning dated January 8, 2015.

n/a - not applicable, not identified as a significant impact.

Source: Table 16a and 16b, Traffic Impact Study, Overland Traffic, August 2016.

Table by CAJA Environmental Services, January 2017.

- b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

**Less Than Significant Impact.** A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

### Impacts on Regional Transportation System

The CMP was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all state highways and some arterials within the County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding.

For purposes of the CMP LOS analysis, an increase in the freeway volume by 150 vehicles per hour during the am or pm peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2% in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the am or pm peak requires further analysis. The intersection of Santa Monica and Bundy Drive is the nearest CMP intersection. This CMP intersection is analyzed in the traffic study. The intersection has been identified to operate in the

future (2019) at LOS D during the morning and evening Peak hours. An increase of less than one percent (0.2% during the AM Peak and 0.3% during the PM Peak) has been identified in the study as the project impact. This is below the 2% threshold for a potential CMP intersection impact. No City of Los Angeles or CMP significant impacts are identified with construction of this Project.

The Project volumes on the area freeways are anticipated to be dispersed throughout the system. The Project is closest to the San Diego Freeway and Santa Monica Freeway. Based on the trip distribution patterns in the area, the project's access and proximity to destination points throughout the City, it is anticipated that, conservatively, no more than 15% of the Project volumes will be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be 17 vehicles during the peak hours. This amount of traffic is below the threshold needed for further evaluation. No CMP intersection or freeway impacts are anticipated. A less than significant impact would occur.

**c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

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

**Less Than Significant Impact.** A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

**Roadway Requirements Along the Project Frontage**

Santa Monica Boulevard is designated as a Boulevard II and provides the northern boundary of the Project site. The current right-of-way along the Project frontage is 100 feet. The Mobility Plan 2035 requires 110 feet of right-of-way with an 80-foot roadway and 15-foot sidewalks. The Project will need to dedicate 5 feet of property along Santa Monica Boulevard.

Granville Avenue is designated as a Local Street and provides the western boundary of the Project site. The current right-of-way along the Project frontage is 60 feet. The Mobility Plan 2035 requires 60 feet of right-of-way with a 36-foot roadway and 12-foot sidewalks. The Project will not be required to provide additional dedication along the Granville Avenue frontage.

Stoner Avenue is designated as a Local Street and provides the eastern boundary of the Project site. The current right-of-way along the Project frontage is 60 feet. The Mobility Plan 2035 requires 60 feet of

right-of-way with a 36-foot roadway and 12-foot sidewalks. The Project will not be required to provide additional dedication along the Stoner Avenue frontage.

An alley provides the southern boundary of the Project Site. The current right-of-way along the Project frontage is 15 feet with a small portion of 20 feet in width. The Mobility Plan 2035 requires 20 feet of right-of-way along alleys. The Project will be required to provide an additional 2.5 to 5 feet of alley dedication dependent on the location of the current centerline.

Any potential dedication would not create a hazardous design feature but would simply increase the right-of-way.

### **Pedestrian Safety**

Temporary impacts to pedestrian safety could occur during construction, especially on Santa Monica Boulevard, Stoner Avenue, and Granville Avenue. The Project will be required to comply with and obtain approvals from the Bureau of Street Services and the Department of Building and Safety, pursuant to LAMC Section 62.45 (Materials or Equipment in Streets, Permits, Regulations, Fees) and 91.3306 (Protection of Pedestrians).. This compliance will ensure the safety of pedestrians, as the construction area could create hazards. Therefore, impacts would be less than significance.

### **Proximity to a School**

The Project Site is in close proximity to several schools, the nearest being University High School, located at 11800 Texas Avenue, approximately 275 feet north across Santa Monica Boulevard and Ohio Avenue. University High and other nearby schools (Brockton Avenue Elementary and Saint Sebastian School) would be generally shielded from the Project Site by intervening residential and commercial buildings to the north. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Haul trucks and delivery trucks would access the Site from Stoner Avenue and Granville Avenue, which is not near any schools.

### ***Regulatory Compliance Measure***

#### **RCM-16-1      Parking Area and Driveway Plan**

The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents and provide code-required emergency access, to the West Los Angeles District Office of the Bureau of Engineering and the Department of Transportation for review and approval.

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

**Less Than Significant Impact.** A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site.

**Access & Circulation**

Vehicular access will be provided from Stoner Avenue approximately mid site for the Project. The residential and commercial parking will be separated within the interior garage. A loading zone will be provided along the southern boundary of the Project site with access from the east-west alley. The alley spans from Granville Avenue to Stoner Avenue. Pedestrian access would be provided on Santa Monica, Stoner, and Granville. The Project will not result in inadequate emergency access to the Project Site or surrounding area. Access, including driveway widths and aisles would comply with LAMC and Fire Code access requirements. Impacts related to emergency access would be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

**Public Transit**

Public transportation in the Project area is provided by the Metropolitan Transportation Authority (Metro), the City of Santa Monica Big Blue Bus (BBB), and Metro Express:

***Existing***

- Metro Route 4 operates along Santa Monica Boulevard between Downtown Los Angeles, Hollywood, West Hollywood, Beverly Hills, Century City, West Los Angeles to Cotner Avenue and westerly to the City of Santa Monica Ocean Avenue during late night owl.
- Metro Rapid Route 704 operates along the same route as Metro Route 4 but with limited stops to save travel time and provide faster services between the communities. Route 704 travels to/from the City of Santa Monica throughout the full day. Bus stops are located at Santa Monica Boulevard and Bundy Drive approximately 375 feet from the Project and at Santa Monica Boulevard and Barrington Avenue approximately 375 feet from the Project
- Santa Monica BBB provides Route BBB 1 along Santa Monica Boulevard with a stop at Westgate Avenue and travels between the City of Santa Monica and the UCLA Transit Center.

- Metro Route 20 operates along Wilshire Boulevard between Downtown Los Angeles between Koreatown, Hancock Park, Park La Brea, Beverly Hills, Westwood, Brentwood and with late night service west of Westwood Boulevard to the City of Santa Monica.
- Metro Rapid Route 720 operates along the same route as Metro Route 20 but with limited stops to save travel time and provide faster services between the communities. Route 720 travels to/from the City of Santa Monica throughout the full day.
- Santa Monica BBB provides Route BBB 2 along Wilshire Boulevard with a stop at Westgate Avenue and travels between the City of Santa Monica and the UCLA Transit Center.

The Metro Exposition Line is a light rail line designed to connect downtown Los Angeles with Santa Monica. This project has been completed between downtown Los Angeles and Culver City. It was opened to the public in 2012. The second phase extends the line to Santa Monica and opened in May 2016. Seven new stations and three parking and ride lots are part of the rail project. A station at Expo and Bundy is approximately one from the Project Site.

The Metro Wilshire Bus Rapid Transit Project was recently completed and was developed to improve bus passenger travel times, reliability, ridership and encourage shift to public transit. Within the project area, peak hour bus lanes have been created by converting existing curb lanes to peak hour bus lanes in each direction with an upgrade to the existing transit signal priority system. The bus lanes are operational from 7 to 9 AM and from 4 to 7 PM weekdays.

### ***Transit Analysis***

As per Congestion Management Program (CMP) 2008 guidelines, person trips can be estimated by multiplying the total trips generated by 1.4. The trips assigned to transit may be calculated by multiplying the person trips generated by 3.5%. The CMP Transit trip generation calculation is shown in Table 3.16-14. Transit services in the area have been observed to be currently operating under capacity. This level of transit increase is not expected to adversely affect the current ridership of the transit services in the area.

**Table 3.16-14  
Transit Trips**

<b>Trips</b>	<b>Daily</b>	<b>AM Peak Hour</b>	<b>PM Peak Hour</b>
Project Trips	1,006	60	113
Person Trips (x 1.4)	1,408	84	158
Transit Trips (person trips x 3.5%)	49	3	6
<i>Source: Table 14, Traffic Impact Study, Overland Traffic, August 2016. Table by CAJA Environmental Services, January 2017.</i>			

### **Bicycles**

The City of Los Angeles adopted a 2010 Bicycle Master Plan and the Mobility Plan 2035 to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. A brief definition of the bicycle facilities is provided below:

- **Bicycle Path** – A bicycle path is facility that is separated from the vehicular traffic for the exclusive use of the cyclist (although sometimes combined with a pedestrian lane). The designated path can be completely separated from vehicular traffic or cross the vehicular traffic with right-of-way assigned through signals or stop signs.
- **Bicycle Lane** – A bicycle lane is typically provided on street with a designated lane stripped on the street for the exclusive use of the cyclist. The bicycle lanes are occasionally curbside, outside the parking lane, or along a right turn lane at intersections.
- **Bicycle Route** – A bicycle route is a designated route in a cycling system where the cyclist shares the lane with the vehicle. Cyclist would follow the route and share the right-of-way with the vehicle.

The City of Los Angeles Mobility Plan 2035 has identified a Bicycle Enhanced Network. The Mobility Plan indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. This plan entails roadways be improved with bike detectors at actuated signals. Barrington Avenue is identified and part of the Bicycle Enhanced Network segments from the Neighborhood Enhanced Network. Bundy Avenue is identified part of the Tier 3 bicycle lanes network.

Santa Monica Boulevard and Bundy Drive are identified as part of the backbone bikeway network by the City of Los Angeles. Both Streets are identified for Bicycle Lanes through the City of Los Angeles in the project area. Ohio Avenue and Barrington Avenue are identified as part of the neighborhood bikeway network. Both streets have existing Bike Routes in the project area. Olympic Boulevard is identified as part of the Green Bike Network with a funded Bike Path.

Municipal code 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses, including the proposed retail component, require one short term and one long term bicycle space per 2,000 square feet of floor area. Multi-family residential requires one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. The Project must provide, at a minimum, 26 short term and 194 long term bicycle spaces. The LAMC allows for a reduction of one required parking space for every four bicycle spaces for commercial and up to 10% of the residential parking or 30% if the Project has applied and received a density bonus. This Project is providing full code required vehicle parking and not reducing the amount as permitted for the bicycle parking that is being provided.



## **Pedestrian Facilities**

Construction activities are expected to be fully contained within the Project Site and are not expected to impede access to the sidewalks around the Site. Temporary fencing (see **Mitigation Measure 14-3**) and scaffolding/walkways will be provided to protect pedestrians from the construction site activities. During operation, the Project would not impact any sidewalks. There are uncontrolled/unlighted crosswalk at Westgate/Santa Monica and Stoner Avenue/Santa Monica. There are no public benches or seating along the sidewalks. The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

## 17. TRIBAL CULTURAL RESOURCES

**Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

**Less Than Significant Impact.** The Project's demolition of the existing structures, therefore, will not involve the demolition of any historic resources. The Site is not identified by the City in any HPOZs, HCM, or Historic Preservation Review.<sup>194</sup> According to the City's Office of Historic Resources, the property is not designated and was not recorded by SurveyLA or any other survey.<sup>195</sup> Therefore, impacts would be less than significant.

- 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.**

**Less Than Significant with Mitigation Incorporated.** Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

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<sup>194</sup> ZIMAS search for 11752 Santa Monica, website: <http://zimas.lacity.org/>.

<sup>195</sup> Office of Historic Resources, December 6, 2016.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As 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.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on August 23, 2016, and this 30-day notification period ended September 23, 2016. On September 7, 2016, the Gabrieleno Band of Mission Indians –Kizh Nation (Tribe) submitted a comment requesting that a Native American Monitor be present on the site during any and all ground disturbance. On October 12, 2016, the Tribe confirmed that a consultation was not being requested. Upon further discussion with the Tribe, it was determined that substantial evidence exists to show that cultural resources of value to the Gabrieleno Tribe have been found in the area. Because of the proximity of location to where cultural resources have been found, the Project has the potential to uncover additional resources of value to the Gabrieleno Band of Mission Indians –Kizh Nation during ground disturbance for the project. With implementation of **Mitigation Measure MM-17-1** and compliance with **RCM-5-1** and **RCM-5-3**, impacts of the Project would be less than significant.

## **Mitigation Measures**

### **MM-17-1      Discovery of Tribal Cultural Resources**

Prior to the issuance of a grading permit, applicant or their agent shall retain a professional Native American Monitor to observe ground disturbance activities undertaken on the Project Site. The Native American Monitor shall be selected in consultation with the Gabrieleno Band of Mission Indians–Kizh Nation. Evidence shall be provided to the Department of City Planning that the Native American Monitor has been retained prior to the issuance of a grading permit.

Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity. Monitoring of the Project Site during ground disturbance activities shall comply with the following:

- The applicant, or their agent, shall obtain a professional Native American Monitor, or monitors, by contacting the Gabrieleno Band of Mission Indians – Kizh Nation. Prior to the issuance of a grading permit, evidence shall be provided to the Department of City Planning that monitor(s) have been obtained; A Native American Monitor shall be secured for each grading unit. In the event that there are simultaneous grading units operating at the same time, there shall be one monitor per grading unit;
- In the event that subsurface archaeological resources, human remains, or other tribal cultural resources are encountered during the course of ground disturbance activities work shall cease in the area of the find until the archaeological or other tribal cultural resources are assessed and subsequent recommendations are determined by a qualified archaeologist. The qualified archaeologist shall specify a radius around where resources were encountered to protect such resources until the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 have been fulfilled. Project activities may continue outside of the designated radius area;
- In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, including the required notification to the County Coroner and the Native American Heritage Commission;
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC).

## 18. UTILITIES AND SERVICE SYSTEMS

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

**Less Than Significant Impact.** A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.<sup>196</sup> Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)<sup>197</sup>, which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,<sup>198</sup> and currently treats an average daily flow of approximately 362 mgd.<sup>199</sup> Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.<sup>200</sup> This allocation allowance is monitored by the HTP and the Project's contribution would not affect the amount. Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's discharge is typical of the area and would not require any on-site treatment before flowing to the sewer. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

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<sup>196</sup> *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

<sup>197</sup> *LA Sewers:* [http://www.lasewers.org/treatment\\_plants/about/index.htm](http://www.lasewers.org/treatment_plants/about/index.htm).

<sup>198</sup> *Los Angeles Sanitation:* <http://www.lacitysan.org/irp/Wastewater.htm>.

<sup>199</sup> *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website:* <http://www.lacitysan.org/wastewater/factsfigures.htm>.

<sup>200</sup> *Los Angeles City Clerk, Ordinance 166,060:* <http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121>

- b) **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

***Wastewater Generation, Treatment Facilities, and Existing Infrastructure***

As shown on Table 3.18-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a total of approximately 20,531 gallons per day (gpd) (or 0.021 mgd) of wastewater. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed. It also does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 3.18-1  
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
<b>Project</b>			
Residential – Studio and Live/Work	30 units	75 gallons / unit	2,250
Residential – 1-bedroom	59 units	110 gallons / unit	6,490
Residential – 2-bedroom	60 units	150 gallons / unit	9,000
Residential – 3-bedroom	4 units	190 gallons / unit	760
Restaurant	6,011 sf	300 gallons /1,000 sf	1,803
Retail	9,106 sf	25 gallons /1,000 sf	228
<b>Proposed</b>			<b>20,531</b>
<p><i>Note: sf = square feet; gpd = gallons per day</i>  <i>Rates: Sewage Generation Factor, effective date April 6, 2012: <a href="http://lacitysan.org/fmd/pdf/sfcfeerates.pdf">http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</a></i>  <i>Retail – Less than 100,000 square feet is 25 gallons/1,000 sf</i>  <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i>  <i>Table: CAJA Environmental Services, January 2017.</i></p>			

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity

(see **Regulatory Compliance Measures RCM-18-1**). A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other residential and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur as result of the Project. Additionally, there is adequate treatment capacity within the HTP system to accommodate the Projects' daily wastewater generation (remaining capacity of approximately 88 mgd), and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater. Therefore, with the mitigation detailed below, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

### ***Water Consumption and Treatment Facilities***

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. As shown on Table 3.18-3, Project Estimated Water Consumption, it is estimated the Project will consume a total of approximately 21,773 gallons per day (gpd) (or 0.022 mgd or 24 acre-feet per year<sup>201</sup>) of water. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed. It also does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 3.18-2  
Project Estimated Water Consumption**

Land Use	Size	Water Consumption Rates	Total (gpd)
<b>Project</b>			
Residential – Studio and Live/Work	30 units	88.5 gallons / unit	2,655
Residential – 1-bedroom	59 units	129.8 gallons / unit	7,658
Residential – 2-bedroom	60 units	177 gallons / unit	10,620
Residential – 3-bedroom	4 units	224 gallons / unit	896
Restaurant	6,011 sf	384 gallons /1,000 sf	2,308

<sup>201</sup> 1 acre foot = 325,851.429 US gallons

**Table 3.18-2  
Project Estimated Water Consumption**

Land Use	Size	Water Consumption Rates	Total (gpd)
Retail	9,106 sf	32 gallons /1,000 sf	291
<b>Proposed</b>			<b>21,773</b>
<p><i>Note: sf = square feet; gpd = gallons per day</i>  <i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i>  <i>Rates: Sewage Generation Factor, effective date April 6, 2012: <a href="http://lacitysan.org/fmd/pdf/sfcfeerates.pdf">http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</a></i>  <i>Retail – Less than 100,000 square feet is 25 gallons/1,000 sf</i>  <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i>  <i>Table: CAJA Environmental Services, January 2017.</i></p>			

The Water Service Organization (WSO) should be able to provide the domestic needs of the Project from the existing water system. The WSO cannot determine the impact on the existing water system until the fire demands of the Project are known. Once a determination of the fire demands has been made, LADWP will assess the need for additional facilities, if needed. This is described as **Regulatory Compliance Measure RCM-14-1** above.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. **Regulatory Compliance Measure RCM-18-2** will ensure that the Project's impacts to the water conveyance system would be less than significant.

### ***Regulatory Compliance Measures***

#### **RCM-18-1      Wastewater Service**

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.



As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

#### **RCM-18-2     Water Service**

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan.

**c)     Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project Site is located in an urbanized area of the City. The Project Site is currently developed with buildings and surface parking and is almost completely impervious. The Project will similarly cover the entire site with a building. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff.

Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRC, and Low Impact Development requirements. The Project is required to implement stormwater control measures during its construction phase. Any construction during the rainy season (between October 1 and April 15) would implement a Wet Weather Erosion Control Plan. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for polluted runoff to a less than significant level.

**d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Less Than Significant Impact.** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

***Water Supply Assessment***

*State CEQA Guidelines* Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. Thus, the Project is not subject to SB 221 as it does not include a residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

- (a) Residential developments of more than 500 dwelling units;
- (b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- (c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;
- (d) Hotels or motels with more than 500 rooms;
- (e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;
- (f) Mixed use projects containing any of the foregoing; or
- (g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

The Project is not subject to SB 610 as it does not meet the listed requirements because the Project only includes 154 residential units and the Project's commercial component would employ fewer than 1,000 persons.

### ***Drought Conditions***

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.<sup>202</sup> The 2015 Urban Water Management Plan (UWMP) takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately  $\pm 5$  percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.<sup>203</sup>

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. The Executive Order provides water savings by directing the State Water Resources Control Board to implement mandatory water reductions in cities and towns to reduce water usage by 25% or approximately 1.5 million acre-feet. The Executive Order calls for local water agencies to implement conservation pricing to discourage water waste.<sup>204</sup> State mandated conservation and reductions are implemented by LADWP.

The Project is estimated to use approximately 28 acre-feet per year. The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.<sup>205</sup> The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses

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<sup>202</sup> LADWP, *Drought Information*: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?\\_adf.ctrl-state=nviecbhak\\_4&\\_afLoop=932704326968157](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afLoop=932704326968157)

<sup>203</sup> 2015 *Urban Water Management Plan*, Los Angeles, pg. ES-12: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmp?\\_afLoop=476955298450592&\\_afWindowMode=0&\\_afWindowId=null#%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D476955298450592%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Ds82ee5qky\\_17](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmp?_afLoop=476955298450592&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D476955298450592%26_afWindowMode%3D0%26_adf.ctrl-state%3Ds82ee5qky_17), June 28, 2016.

<sup>204</sup> California Governor: <http://gov.ca.gov/news.php?id=18910>, accessed August 19, 2015

<sup>205</sup> 2015 *Urban Water Management Plan*, Los Angeles, pg. ES-23.

based on SCAG 2012 RTP.<sup>206</sup> The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).<sup>207</sup> Neither the Urban Water Management Plan forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use, and does not propose a General Plan Amendment or Zone Change. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. As set forth above, the Project is consistent with the General Plan.

The following regulatory compliance measures would ensure that impacts related to the project's water demand remain less than significant:

### ***Regulatory Compliance Measures***

#### **RCM-18-3      Water Efficiency Requirements**

The Project shall implement all applicable mandatory measures of Ordinance No. 180,822 (The Water Efficiency Requirements for New Development), the 2014 LA Plumbing Code, 2013 Cal Green Building Code, and 2014 LA Green Building Code the LA Green Building Code that would have the effect of reducing the Project's water use.

#### **RCM-18-4      Landscape**

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

#### **RCM-18-5      LID Ordinance and Stormwater BMPs**

The Project shall comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

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

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<sup>206</sup> 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12:

<sup>207</sup> SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

**Less Than Significant Impact.** A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's generation of 0.22 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Also, the HTP has sufficient capacity for the Project's flow. Therefore, impacts to wastewater treatment would be less than significant.

**f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**Less Than Significant Impact.** A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill"), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.<sup>208</sup>

**Facilities**

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,582 tpd (2014 daily average).<sup>209</sup> It is expected to close in 2037.<sup>210</sup> It has a remaining daily intake availability of 4,993 tpd, and has approximately 96.8 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy.<sup>211</sup> As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).<sup>212</sup> Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.<sup>213</sup> Therefore, the Sunshine Canyon

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<sup>208</sup> City of Los Angeles, Fact Sheet: Solid Waste Facilities: [http://www.zerowaste.lacity.org/files/info/fact\\_sheet/SWIRPFacilitySystemInfrastructureFactSheet\\_032009.pdf](http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFacilitySystemInfrastructureFactSheet_032009.pdf)

<sup>209</sup> County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

<sup>210</sup> 23 years remaining life as of 2014 Annual Report, prepared in December 2015.

<sup>211</sup> State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail>, accessed August 19, 2015.

<sup>212</sup> Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: [http://www.sunshinecanyonlandfill.com/home/newsletter/fall\\_2013\\_newsletter.pdf](http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf), accessed August 19, 2015.

<sup>213</sup> Sunshine Canyon: <http://www.sunshinecanyonlandfill.com/home/Future.html>, August 27, 2015.

Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.<sup>214</sup> The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.<sup>215</sup> It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity. The County is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.<sup>216</sup> Additionally, the County recently completed its final Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

### **Construction**

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at local landfills.

Demolition of the existing buildings (24,684 square feet) would produce demolition waste and recycling opportunities of raw materials. Grading and excavation of approximately 49,220 cy of soils removed would occur over approximately 2 months. Construction of the approximately 175,140 square feet of new

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<sup>214</sup> County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

<sup>215</sup> County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

<sup>216</sup> Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, [http://www.socalconversion.org/pdfs/LACo\\_Conversion\\_PII\\_Report.pdf](http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf), October 8, 2014.

floor area would generate approximately 384 tons of construction waste.<sup>217</sup> Core/shell construction is estimated to take approximately 18.5 months. Therefore, Project construction would generate approximately 1.03 tons per day of construction waste on average throughout the construction phase.<sup>218</sup>

A majority of the City's construction and demolition waste was sent to the Puente Hills Landfill.<sup>219</sup> The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.<sup>220</sup> The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.<sup>221</sup> In 2016, the Puente Hills Intermodal Facility provides a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.<sup>222</sup> The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.<sup>223</sup> The Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste. Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Therefore, short-term construction impacts to landfills and solid waste services will be less than significant.

### **Operation**

As shown on Table 3.18-3, Project Estimated Solid Waste Generation, it is estimated the Project will generate a total of approximately 2,490 pound per day (or 1.24 tons per day) of solid waste. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed. It also does not take any credit for the proposed sustainable and recycling features of the Project.

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<sup>217</sup> Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: 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 A-2, page A-1).

<sup>218</sup> 18.5 months x 20 working days per month = 370 working days. 384 tons / 370 days = 1.03 tons per day.

<sup>219</sup> City of Los Angeles, Fact Sheet: Solid Waste Facilities: [http://www.zerowaste.lacity.org/files/info/fact\\_sheet/SWIRPFacilitySystemInfrastructureFactSheet\\_032009.pdf](http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFacilitySystemInfrastructureFactSheet_032009.pdf)

<sup>220</sup> County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>.

<sup>221</sup> County Sanitation Districts, Puente Hills MRF Fact Sheet: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>.

<sup>222</sup> Puente Hills Landfill: <http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708>.

<sup>223</sup> Mesquite Regional Landfill: <http://www.mrlf.org/index.php?pid=5>.

**Table 3.18-3  
Project Estimated Solid Waste**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
<b>Project</b>			
Commercial	41 employees	11.1 pounds / employee	455
Residential	433 residents	4.7 pounds / resident	2,035
<b>Proposed</b>			<b>2,490</b>
<i>Note: sf = square feet</i> <a href="http://www.calrecycle.ca.gov/lgcentral/goalmeasure/DisposalRate/MostRecent/default.htm">http://www.calrecycle.ca.gov/lgcentral/goalmeasure/DisposalRate/MostRecent/default.htm</a> <i>Table: CAJA Environmental Services, January 2017.</i>			

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.25 tons per day increase in solid waste resulting from the Project. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City had an accelerated goal of 75 percent by 2013. During fiscal 2013-14, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,<sup>224</sup> with the goal to achieve a 90 percent diversion by 2025.<sup>225</sup> The regulatory compliance measure listed below would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

### ***Regulatory Compliance Measures***

#### **RCM-18-6      Designated Recycling Area**

In compliance with Los Angeles Municipal Code, the Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

#### **RCM-18-7      Construction Waste Recycling**

<sup>224</sup> City of Los Angeles, Department of Public Works, Annual Report, 2013-14: <http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf>, April 11, 2016.

<sup>225</sup> City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18: [http://www.lacitysan.org/general\\_info/pdfs/Strategic\\_Plan2013-14.pdf](http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf), accessed February 24, 2014.



In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

**RCM-18-8      Commercial/Multifamily Mandatory Recycling**

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

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

**Less Than Significant Impact.** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills. The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to close in 2037. The Waste-By-Rails program to the Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

## ENERGY ANALYSIS

### Regulatory Framework

#### *State Building Energy Efficiency Standards*

New buildings in California are required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations (CCR). The California Green Building Standards Code (CalGreen) establishes “energy budgets” for different types of residential and nonresidential buildings, with which all new buildings must comply. The energy budget has a space conditioning component and a water-heating component, both expressed in terms of energy (British thermal units, or BTU) consumed per year. The regulations allow for trade-offs within and between the components to meet the overall budget. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.<sup>226</sup>

#### *California Green Building Code*

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” As of January 1, 2011, the California Green Building Standards Code is mandatory for all new buildings constructed in the state. The California Green Building Standards Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The California Green Building Standards Code was most recently updated in 2013 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2014.

#### *2015 Final Power Integrated Resource Plan*<sup>227</sup>

The LADWP released the 2015 Final Power Integrated Resource Plan (IRP) in December 2015, which provides a 20-year framework to ensure LADWP will meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The IRP is an update of the 2014 IRP, and reflects evolving environmental, regulatory, and economic developments. Major changes from the 2014 IRP include a newly created and redesigned energy efficiency (EE) program to achieve at

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<sup>226</sup> CalGreen: [http://www.documents.dgs.ca.gov/bsc/CALGreen/2010\\_CA\\_Green\\_Bldg.pdf](http://www.documents.dgs.ca.gov/bsc/CALGreen/2010_CA_Green_Bldg.pdf), April 8, 2016.

<sup>227</sup> 2015 Final Power IRP: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=11j0xz3uxz\\_4&\\_afLoop=399494189004579](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afLoop=399494189004579)

least 10 percent less customer usage of electricity by 2020; efforts underway to expand upon the existing Power Reliability Program (PRP) by developing a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

This 2015 IRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 megawatt (MW) of large scale solar, approval of the 250 MW Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The Fit 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10 MW, together with a commitment to a large utility scale project of approximately 50 MW to be built by the same vendor at LADWP's Beacon Solar site.<sup>228</sup> This IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.<sup>229</sup>

## **Los Angeles Department of Water and Power**

### ***Electricity***

The LADWP supplies more than 26 million megawatt hours (mw-h) of electricity a year for the City of Los Angeles' 1.4 million customers.<sup>230</sup> The utility was established more than 100 years ago to provide water and electric needs to the City's businesses and residents. LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. The power supply sources include: 39 percent from coal, 22 percent from natural gas, 3 percent from large hydroelectric, 11 percent from nuclear, 5 percent from unspecified sources, and

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<sup>229</sup> LADWP, 2015 IRP, pg ES-1: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=11j0xz3uxz\\_4&\\_afLoop=399494189004579](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afLoop=399494189004579)

<sup>230</sup> LADWP, website: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?\\_adf.ctrl-state=na2o8wvza\\_4&\\_afLoop=81976737428000](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afLoop=81976737428000), April 8, 2016.

20 percent from renewables which include small hydroelectric, solar, wind, geothermal, biomass, and waste.<sup>231</sup> Under the City Charter, LADWP has an obligation to serve the citizens of the City.<sup>232</sup>

Table 3.18-4, LADWP Electricity Capacity, shows the LADWP electricity system capacity and Table 3.18-5, LADWP Energy Usage, shows the LADWP power usage. Table 3.18-6, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

**Table 3.18-4**  
**LADWP Electricity Capacity**

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177
Source: LADWP: <a href="https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&amp;_afLoop=1119458526572567">https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&amp;_afLoop=1119458526572567</a> Table: CAJA Environmental Services, April 2016.	

**Table 3.18-5**  
**LADWP Energy Usage**

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
<b>Total</b>	<b>23.14</b>
Fiscal Year 2013. Source: LADWP: <a href="https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&amp;_afLoop=1119458526572567">https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&amp;_afLoop=1119458526572567</a> Table: CAJA Environmental Services, April 2016.	

<sup>231</sup> LADWP, Power Facts and Figures website: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=scgxlug8o\\_21&\\_afLoop=82063279159000&\\_afWindowMode=0&\\_afWindowId=na2o8wvza\\_1#%40%3F\\_afWindowId%3Dna2o8wvza\\_1%26\\_afLoop%3D82063279159000%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dna2o8wvza\\_33](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afLoop=82063279159000&_afWindowMode=0&_afWindowId=na2o8wvza_1#%40%3F_afWindowId%3Dna2o8wvza_1%26_afLoop%3D82063279159000%26_afWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33), April 8, 2016.

<sup>232</sup> LADWP Reliability Study, December 31, 2010, pg. i: [http://www.swrcb.ca.gov/water\\_issues/programs/ocean/cwa316/saccwis/docs/sa\\_ladwp\\_2011reliability.pdf](http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/sa_ladwp_2011reliability.pdf)

**Table 3.18-6  
Energy Sales and Peak Demand**

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2016-17	8,206	12,760	1,985	455	224	26,878	6,721
2017-18	8,215	12,586	1,989	457	270	26,714	5,671
2018-19	8,242	12,413	1,994	458	350	26,638	5,650
2019-20	8,279	12,251	1,997	460	429	26,695	5,634
2020-21	8,328	12,339	1,997	462	512	26,859	5,638
2021-22	8,411	12,576	1,998	464	592	27,297	5,730
2022-23	8,510	12,772	1,997	466	675	27,728	5,812
2023-24	8,613	12,989	1,996	468	755	28,253	5,899
2024-25	8,710	13,230	1,994	469	834	28,649	5,991
gw-h – gigawatt-hours; mw – megawatts Misc. includes streetlighting, Owens Valley, and intra-departmental LADWP, 2015 IRP, Table A-1, page A-5: <a href="https://www.ladwp.com/ladwp/faces/wcnaw_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&amp;_afzLoop=399494189004579">https://www.ladwp.com/ladwp/faces/wcnaw_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&amp;_afzLoop=399494189004579</a> Table: CAJA Environmental Services April 2016.							

### Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

### Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy

efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.<sup>233</sup>

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:<sup>234</sup>

- Load Factor (%) = (kw-h / hours / kw) X 100%
- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)\*100].

### ***Natural Gas Supply and Demand***

Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout the southern half of California. SCG owns and operates 95,000 miles of gas distribution mains and service lines, as well as nearly 3,000 miles of transmission and storage pipeline. The utility also owns gas transmission compressor stations and underground storage facilities. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.<sup>235</sup> Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these

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<sup>233</sup> LADWP, 2014 IRP, pg 47: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=q463ohn9x\\_17&\\_afLoop=1251830725757441](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afLoop=1251830725757441), April 14, 2015.

<sup>234</sup> Madison Gas and Electric, Glossary for Load Factor: <http://www.mge.com/about/electric/glossary.htm#f>, April 11, 2016.

<sup>235</sup> 2014 California Gas Report, pg 37: <http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf>, April 14, 2015.

agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2016 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.6% from 2016 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 113 Bcf in 2016 to 105 Bcf by 2035. The change reflects an annual growth rate of 0.5% over the forecast period. The noncore, non-EG markets are expected to decline from 170 Bcf in 2016 to 153 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is expected to remain at about its 2015 level through 2035 as gains are offset by the depletion of older oil fields.<sup>236</sup>

In 2016 gas demand for California is projected to average 6,072 million cubic feet per day (cf/day) and is projected to decrease to 4,626 million cf/day by 2035, a decline of 1.35 percent per year.<sup>237</sup> Table 3.18-7, Statewide Total Supplies and Requirements, shows the anticipated statewide total supplies and requirements for natural gas for 2014 to 2030. In 2014 (the latest data available from the 2014 California Gas Report), SCG's highest winter sendout was 4,881 million cf/day and highest summer sendout was 3,393 million cf/day.<sup>238</sup>

**Table 3.18-7**  
**Statewide Total Supplies and Requirements**

	2016	2018	2020	2025	2030
<b>Utility Supply Source</b>					
California Sources	165	165	165	165	165

<sup>236</sup> 2016 California Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, August 31, 2016.

<sup>237</sup> 2016 California Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, August 31, 2016.

<sup>238</sup> 2016 California Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, August 31, 2016.

Out-of-State	5,060	4,758	4,668	4,599	4,489
Non-Utility Served Load	1,132	985	813	547	258
<b>Statewide Supply Source Total</b>	<b>6,358</b>	<b>5,909</b>	<b>5,645</b>	<b>5,312</b>	<b>4,912</b>
<b>Utility Requirements</b>					
Residential	1,181	1,185	1,155	1,114	1,076
Commercial	484	481	473	454	443
Natural Gas Vehicles	46	50	54	66	85
Industrial	964	943	932	930	938
Electric Generation	1,897	1,623	1,566	1,548	1,453
Enhanced Oil Recovery Steaming	46	46	46	46	46
Wholesale/International Exchange	241	246	247	247	256
Company Use and Unaccounted-For	79	74	73	72	71
Non-Utility Served Load	1,132	985	813	547	258
<b>Statewide Requirements Total</b>	<b>6,072</b>	<b>5,623</b>	<b>5,360</b>	<b>5,026</b>	<b>4,626</b>
<i>All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding.  Average temperature and normal hydro year.  2016 California Gas Report: <a href="https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf">https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf</a>, August 31, 2016.  Table: CAJA Environmental Services December 2016.</i>					

The SCG demands for 2015 and 2035 are shown in Table 3.18-8. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.<sup>239</sup>

**Table 3.18-8**  
**SCG Natural Gas Demands**

	<b>2015</b>	<b>2035</b>	<b>Difference</b>
Residential	239	218	-21
Core Commercial	81	65	-16
Non-Core Commercial	16.4	14.7	-1.7

<sup>239</sup> 2016 California Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, August 31, 2016.



Industrial	21.6	15.3	-6.3
<i>All measurements in billion cf</i> <i>2016 California Gas Report:</i> <a href="https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf">https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf</a> , <i>August</i> <i>31, 2016.</i> <i>Table: CAJA Environmental Services December 2016.</i>			

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

#### *State CEQA Guidelines*

Appendix F, Energy Conservation, of the *CEQA Guidelines* directs an EIR<sup>240</sup> to include the following:

- (a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- (b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- (c) The effects of the project on peak and base period demands for electricity and other forms of energy;
- (d) The degree to which the project complies with existing energy standards;
- (e) The effects of the project on energy resources; and
- (f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

#### *City of Los Angeles CEQA Thresholds Guide*

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and

<sup>240</sup> The analysis is included in this MND for disclosure purposes.

- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or
- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

### **Methodology**

The South Coast Air Quality Management District (SCAQMD) has electricity<sup>241</sup> and natural gas<sup>242</sup> consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the State *CEQA Guidelines* further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the State *CEQA Guidelines*, this includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

### **Project Impacts**

#### ***Construction***

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Electricity, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to reduce air pollution by using electricity from power poles, rather than temporary diesel or gasoline powered generators. A temporary water supply, primarily for fugitive dust suppression and street sweeping, would also be supplied by the LADWP. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a

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<sup>241</sup> SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.

<sup>242</sup> SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.

net increase in on-site electricity use over existing conditions since the Site is occupied. Therefore, electricity impacts during construction would be less than significant.

Heavy-duty construction equipment associated with these activities would include diesel-fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 6.178 mpg in 2015.<sup>243</sup>

In 2012, California consumed a total of 337,666 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.1 billion gallons by the transportation sector.<sup>244</sup> Construction of the Project would use approximately 0.0001 percent of the statewide gasoline consumption and 0.00001 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

### *Energy Conservation*

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))<sup>245</sup> to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to

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<sup>243</sup> Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>.

<sup>244</sup> US EPA, State Energy Data System, Table F-3: [http://www.eia.gov/state/seds/sep\\_fuel/html/pdf/fuel\\_mg.pdf](http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf).

<sup>245</sup> California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

### **Operation**

#### *Electricity Demand*

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8,242 gw-h and commercial uses consisting of 12,413 gw-h. The peak demand would be 5,650 megawatts (mw).<sup>246</sup>

As shown in Table 3.18-9, Project Estimated Electricity Demand, the Project would demand approximately 1,275,089 kw-h/year (1.28 gw-h/year) of electricity. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed. It also does not take any credit for the proposed sustainable and energy conservation features of the Project.

**Table 3.18-9  
Project Estimated Electricity Demand**

<b>Land Use</b>	<b>Size</b>	<b>Electricity Rates</b>	<b>Total (kw-h/yr)</b>
Residential	154 units	5,626.5 kw-h / unit	866,481
Restaurant	6,011 sf	47.45 kw-h / sf	285,222
Retail	9,106 sf	13.55 kw-h / sf	123,386
<b>Total Increase</b>			<b>1,275,089</b>

<sup>246</sup> LADWP, 2014 IRP, Table A-1, page A-5: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_afdf.ctrl-state=9kjcyeafd\\_4&\\_afdfLoop=1178238919540287](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_afdf.ctrl-state=9kjcyeafd_4&_afdfLoop=1178238919540287).

**Table 3.18-9  
Project Estimated Electricity Demand**

Land Use	Size	Electricity Rates	Total (kw-h/yr)
<i>sf = square feet; kw-h = kilowatt-hour; yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Table: CAJA Environmental Services, January 2017.</i>			

The Project's annual electricity consumption would represent approximately 0.04 percent of the forecasted electricity demand in 2018-19.<sup>247</sup> Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 mw of power with a current peak of 6,177 mw. Thus, there is 1,055 mw of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow to 5,650 mw in 2018-2019 and 5,899 mw in 2023-2024.<sup>248</sup> Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.<sup>249</sup> It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

### ***Natural Gas Demand***

As shown in Table 3.18-10, Project Estimated Natural Gas Demand, the Project is estimated to demand approximately a net increase of 661,610 cf/month (or 22,054 cf/day) of natural gas. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed. It also does not take any credit for the Project's sustainable and energy conservation features.

<sup>247</sup>  $11.4 / 26,638 \times 100\% = 0.04\%$

<sup>248</sup> 2015 Power Integrated Resource Plan, Table A-1, Forecasted growth in Annual Peak Demand: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_adf.ctrl-state=11j0xz3uxz\\_4&\\_afLoop=399494189004579](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afLoop=399494189004579)

<sup>249</sup> LADWP Rules Governing Water and Electric Service: [http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/\\$FILE/Rule%2016-d.pdf](http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf).

Natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2019 is estimated at 3,008 million cf/day.<sup>250</sup> The Project's increase (not counting the existing use) of 26,447 cf/day represents approximately 0.0009 percent of the 2019 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

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

**Table 3.18-10**  
**Project Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Residential	154 units	4,011.5 cf / mo	617,771
Commercial	15,117 sf	2.9 cf / mo	43,839
<b>Total Increase</b>			<b>661,610</b>
<i>sf = square feet; cf = cubic feet; mo = month</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Table: CAJA Environmental Services, January 2017.</i>			

Regulatory compliance measures for building efficiency would help alleviate natural gas demand. In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible

<sup>250</sup> <https://www.socalgas.com/regulatory/cgr.shtml>

consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the three sites, Project impacts related to natural gas would be less than significant.

### **Transportation Energy Consumption**

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Project's estimated VMT<sup>251</sup>, and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpg<sup>252</sup>, the Project would use approximately 0.001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

### **Alternative Energy Discussion**

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADWP, the

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<sup>251</sup> Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix to the MND.

<sup>252</sup> Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>.

service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and “other renewables that may be defined later”.<sup>253</sup>

LADWP’s target procurement of energy from renewable resources was 20 percent by 2010. As of 2012, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. LADWP is committed to reach a goal of 35% renewable energy by 2020.<sup>254</sup>

With respect to on-site renewable energy sources, because of the Project’s location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City’s Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6.2) shall comply with the following:

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<sup>253</sup> City of Los Angeles, Department of Water and Power, *Renewables Portfolio Standard Policy and Enforcement Program*, amended December 2013.

<sup>254</sup> [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?\\_adf.ctrl-state=2zwwyiver\\_4&\\_afLoop=482029044070877](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afLoop=482029044070877)



2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's high wind resource potential.<sup>255</sup> Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.<sup>256</sup> In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

### ***Regulatory Compliance Measure***

**RCM-18-9** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

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<sup>255</sup> California Energy Commission. *California Wind Resource Potential*,  
[http://www.energy.ca.gov/maps/renewable/Wind\\_Potential.pdf](http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf).

<sup>256</sup> California Energy Commission, *California Solar Resources*, April 2005,  
<http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF>.

## 19. MANDATORY FINDINGS OF SIGNIFICANCE

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Less Than Significant Impact.** A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. There are no trees or vegetation on the Site. There are five street trees on the City sidewalk along Santa Monica Boulevard. These are off-site street tree as part of the City's planting program and not a native originating (natural to the location) trees. The Project will have no significant impact to historic resources. The Project will have a less than significant impact on archeological resources, paleontological resources, and human remains, with regulatory compliance measures. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

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

**Less Than Significant Impact.** A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the IS/MND.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The locations of the related projects are shown in Figure 9 (in Traffic Impact Study, Overland Traffic Consultants, August 2016, included in the appendices) and described in Table 3.16-7. All the related

projects are in the City of Los Angeles, except for Nos. 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24, 25, 27, 28, 29, 33, and 34 which are in the City of Santa Monica.

The related projects include a variety of land uses, including approximately:

- 4,865 residential units (apartments, condominiums, live/work)
- 40,734 square feet of market
- 65,000 square feet of health club
- 897,701 square feet of office (various types)
- 1,458 students and 200,300 square feet of facilities<sup>257</sup> for a total of 4,853 students
- 417,420 square feet of retail
- 134 hotel rooms
- 49,014 square feet of restaurant
- Loss of 88,649 square feet of auto dealership
- 10,800 square feet of warehouse

The nearest related projects to the Project Site are:

- No. 1 – 11660 Santa Monica Boulevard, 58,000 square feet supermarket
- No. 4 – 1466 Westgate Avenue, 65,000 square feet recreation center
- No. 31 – 11567 Santa Monica Boulevard, 72 unit apartment, 4,500 square feet retail, and 12,425 square feet commercial
- No. 36 – 11852 Santa Monica Boulevard, 39 unit apartment and 10,750 square feet auto dealership
- No. 37 – 11800 Santa Monica Boulevard, 150 unit apartment and 40,000 square feet retail
- No. 46 – 1519 Granville, 40 unit apartment
- No. 47 – 1515 Westgate Avenue, 100 unit apartment

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<sup>257</sup> The California Department of Education recommends that the size of schools be calculated at 59 square feet (the minimum) per pupil: <http://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>

Each of these related projects would be subject to their own CEQA analysis (MND or EIR) to evaluate potential impacts and provide mitigation measures where appropriate. The other related projects have several intervening buildings and major roadways in between, and are at least 0.5 mile away or more, distances ensure that any other localized impacts of the related project would not combine with the Project.

### **Aesthetics**

Development of the Project in conjunction with the related projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the related projects (with the exception of Nos. 36, 36, 46, and 47) are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. However, there are no scenic or protected views in the area, and the view corridor along Santa Monica Boulevard is not unique or provides a distinct vantage point, especially to the north in the directions of the related project. Development of related projects is expected to occur in accordance with adopted plans and regulations including SB743 exemptions for aesthetics and parking for transit priority projects. Therefore, cumulative aesthetic impacts would be less than significant.

### **Agriculture and Forestry Resources**

Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

### **Air Quality**

#### ***AQMP Consistency***

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air

quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

### ***Construction and Operational Emissions***

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Project would not be cumulatively considerable after implementation of **Mitigation Measures 3-1**. Therefore, cumulative air quality impacts would be less than significant.

### ***Odor Impacts***

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the Related Projects and the Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

### ***Biological Resources***

The Project would have no impact upon biological resources. Development of the Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Thus, cumulative impacts to biological resources would be considered less than significant.

### ***Cultural Resources***

Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate mitigation for archaeology, paleontology, and

human remains. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

### **Geology and Soils**

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

### **Greenhouse Gas Emissions**

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. Project-specific impacts related to the emission of greenhouse gases would be less than significant.

### **Hazards and Hazardous Materials**

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

### **Hydrology and Water Quality**

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related projects, since this part of the City is already fully developed with

impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

### **Land Use**

None of the related projects would physically divide an established community or conflict with a habitat conservation plan because they are all in urban areas. There are no City or County significant ecological areas in the related projects.<sup>258</sup> Therefore, cumulative land use impacts would be less than significant. Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all related projects would be individually evaluated for consistency with applicable land use standards. Project would not make a cumulatively considerable contribution to land use planning, and cumulative impacts would be less than significant. Therefore, cumulative land use impacts would be less than significant.

### **Mineral Resources**

Development of the Project in combination with the related projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

### **Noise**

The related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each related project (that has not yet been built) would be localized in nature. Besides related projects No. 37 (subject to its own MND), none of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Other related projects are further than the analyzed sensitive receptors for which mitigation measures would reduce impacts to less than significant. Any construction noise from either site, were it to occur concurrently with the Project, would be attenuated by the distance across Granville, and **Mitigation Measures 12-1 through 12-6**. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as implement any mitigation measures that may be prescribed pursuant

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<sup>258</sup> *Navigate LA, City of Los Angeles, Bureau of Engineering, Significant Ecological Areas layer: <http://navigatela.lacity.org/index01.cfm>*

to CEQA. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study. Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

### **Population and Housing**

The related projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles and City of Santa Monica. Any residential related projects would result in direct population growth. The related projects that involve residential developments would cumulatively contribute approximately 4,865 residential dwelling units to the area, generating approximately 13,671 new residents (a conservative assumption including Santa Monica and adjacent communities). The Project includes 187 units and would generate approximately 525 persons. The Project's contribution to any impact is minimal because it represents only 3.8% of the dwelling units and population proposed by all related projects. The net increase of approximately 40 employees is not cumulatively considerable as there are no thresholds for employee impacts. The Project would not displace any residents. The City is expected to increase its population by approximately 411,596 persons from 2016-2025. The Project and related projects would not exceed this projection. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

### **Public Services**

#### ***Fire***

Given the geographic range of the Related Projects, they would be served by a variety of fire stations (Nos. 19, 37, 59).<sup>259</sup> The Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, each of the related projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. The related projects in the City of Santa Monica would be served by Santa Monica Fire Department. Nevertheless, the development on any

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<sup>259</sup> LAFD Fire Station Finder: [http://www.lafd.org/fire\\_stations/find\\_your\\_station](http://www.lafd.org/fire_stations/find_your_station)



new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

### ***Police***

The Project, in combination with the related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. The related projects in the City of Santa Monica would be served by the Santa Monica Police Department. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

### ***Schools***

The Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects is projected to generate approximately 4,409 new residential dwelling units to the area, which will generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Project. In addition, seven of the related projects involve the development of facilities for 1,458 students and an additional 200,300 square feet of school expansion. However each of the new housing units, commercial, and industrial uses would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Cumulative impacts on schools would be less than significant.

### ***Parks and Recreation***

Development of the Project in conjunction with the related projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to

lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

### **Library**

Given the geographic range of the Related Projects, they would be served by a variety of libraries (Brentwood, Westwood, West Los Angeles, Mar Vista).<sup>260</sup> Development of the related projects would likely generate additional demands upon library services. The related projects in the City of Santa Monica would be served by the Santa Monica Public Library. However, there are no planned expansions or new libraries by the LAPL that would be considered a significant impact. Therefore, the cumulative impacts related to library facilities would be less than significant.

### **Traffic**

Development of the Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing With Project scenario) and a cumulative impact analysis (Future baseline w/Project scenario). This cumulative future includes the related projects. The future (2019) with Project analysis shows that there would be a less than significant impact to study intersections and street roadway segments after mitigation measures including a TDM plan and physical intersection improvements. Therefore, the Project's cumulative impact is considered less than significant.

### **Tribal Cultural Resources**

Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to tribal cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate regulations for archaeology, paleontology, and human remains. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

### **Utilities and Service Systems**

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<sup>260</sup> LAPL Locations: <http://www.lapl.org/branches>

Development of the Project, in conjunction with cumulative growth throughout the City of Los Angeles (including the related projects), would further increase the generation of wastewater, demand for potable water within the City, and increase regional demands on landfill capacity.

### **Wastewater**

As shown on Table 3.19-1, Cumulative Estimated Wastewater Generation, it is estimated the related projects and the Project will generate a net total of approximately 1,004,444 gallons per day (gpd) (or 1.0 mgd) of wastewater. The HTP has adequate capacity (88 mgd) to accommodate the Cumulative total. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-1  
Cumulative Estimated Wastewater Generation**

<b>Land Use</b>	<b>Size</b>	<b>Wastewater Generation Rates</b>	<b>Total (gpd)</b>
Residential	4,865 units	150 gallons / unit	729,750
Health Club	65,000 sf	650 gallons / 1,000 sf	42,250
Office	897,701 sf	120 gallons / 1,000 sf	107,724
School	4,853 stu	11 gallons / student	53,383
Retail	417,420 sf	50 gallons / 1,000 sf	20,871
Hotel	134 rooms	120 gallons / room	16,080
Restaurant	49,014 sf	300 gallons / 1,000 sf	14,704
Auto	-88,649 sf	50 gallons / 1,000 sf	-4,432
Market	40,734 sf	80 gallons / 1,000 sf	3,259
Warehouse	10,800 sf	30 gallons / 1,000 sf	324
<b>Related Projects</b>			<b>983,913</b>
<b>Proposed Project</b>			<b>20,531</b>
<b>Cumulative (Related + Project)</b>			<b>1,004,444</b>
<p><i>Note: sf = square feet; gpd = gallons per day</i>  <i>Rates: Sewage Generation Factor, effective date April 6, 2012: <a href="http://lacitysan.org/fmd/pdf/sfcfeerates.pdf">http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</a></i>  <i>Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.</i>  <i>Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.</i>  <i>Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.</i>  <i>Table: CAJA Environmental Services, January 2017.</i></p>			

### **Water**

As shown on Table 3.19-2, Cumulative Estimated Water Demand, it is estimated the related projects and the Project will demand a net total of approximately 1,211,390 gallons per day (gpd) (or 1.2 mgd) of water. The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer months, respectively) to accommodate the cumulative total. The Project represents 2.0 percent of the cumulative total. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and 652,000 AFY in 2020.<sup>261</sup> The cumulative total is approximately 1,359 AFY, which is within the supply of the UWMP and accommodated by any project that conforms to the General Plan and zoning. Related projects that do not would be required to demonstrate that there is adequate supply, through a Water Supply Assessment for example. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-2  
Cumulative Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Residential	4,865 units	177 gallons / unit	861,105
Health Club	65,000 sf	832 gallons / 1,000 sf	54,080
Office	897,701 sf	153.6 gallons / 1,000 sf	137,887
School	4,853 stu	14 gallons / student	67,942
Retail	417,420 sf	64 gallons / 1,000 sf	26,715
Hotel	134 rooms	153.6 gallons / room	20,582
Restaurant	49,014 sf	384 gallons / 1,000 sf	18,821
Auto	-88,649 sf	64 gallons / 1,000 sf	-5,674
Market	40,734 sf	102.4 gallons /1,000 sf	4,171
Warehouse	10,800 sf	38 gallons /1,000 sf	410
<b>Related Projects</b>			<b>1,186,039</b>
<b>Proposed Project</b>			<b>21,773</b>
<b>Cumulative (Related + Project)</b>			<b>1,207,812</b>

<sup>261</sup> 2010 Urban Water Management Plan, Los Angeles, pg. 20: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water.jsessionid=b6mMVfCZsTJlyDLQTNnkIHhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?\\_afLoo p=596574118787894&\\_afWindowMode=0&\\_afWindowId=null#%40%3F\\_afWindowId%3Dnull%26\\_afLoo p%3D596574118787894%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dvzv72rq95\\_4](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water.jsessionid=b6mMVfCZsTJlyDLQTNnkIHhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?_afLoo p=596574118787894&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoo p%3D596574118787894%26_afWindowMode%3D0%26_adf.ctrl-state%3Dvzv72rq95_4).

**Table 3.19-2  
Cumulative Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
<p><i>Note: sf = square feet; gpd = gallons per day</i></p> <p><i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i></p> <p><i>Rates: Sewage Generation Factor, effective date April 6, 2012: <a href="http://lacitysan.org/fmd/pdf/sfcfeerates.pdf">http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</a></i></p> <p><i>Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.</i></p> <p><i>Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.</i></p> <p><i>Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.</i></p> <p><i>Table: CAJA Environmental Services, January 2017.</i></p>			

### ***Solid Waste***

As shown on Table 3.19-3, Cumulative Estimated Solid Waste Generation, it is estimated the related projects and the Project will generate a net total of approximately 78,952 pounds per day of solid waste (or 39 tons). The Sunshine Canyon landfill has adequate capacity (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday) to accommodate the cumulative total. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-3  
Cumulative Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Rates	Total (pounds)
Residential	13,671 residents	4.7 pounds / resident	64,254
Health Club	65,000 sf	31.2 pounds / 1,000 sf	2,028
Office	897,701 sf	6 pounds / 1,000 sf	5,386
School	4,853 stu	0.5 pounds / student	2,466
Retail	417,420 sf	5 pounds / 1,000 sf	2,087
Hotel	134 rooms	4 pounds / room	536
Restaurant	49,014 sf	5 pounds / 1,000 sf	245
Auto	-88,649 sf	9 pounds / 1,000 sf	-798
Market	40,734 sf	5 pounds / 1,000 sf	204
Warehouse	10,800 sf	5 pounds / 1,000 sf	54
<b>Related Projects</b>			<b>76,462</b>
<b>Proposed Project</b>			<b>2,490</b>

**Table 3.19-3  
Cumulative Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Rates	Total (pounds)
<b>Cumulative (Related + Project)</b>			<b>78,952</b>
<i>Note: sf = square feet</i> <i>Rates: CalRecycle Estimated Solid Waste Generation Rates: <a href="http://www.calrecycle.ca.gov/wastechar/wastegenrates/">http://www.calrecycle.ca.gov/wastechar/wastegenrates/</a></i> <i>Table: CAJA Environmental Services, January 2017.</i>			

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects in the City. In addition, related project No. 7 would be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

### **Electricity**

The related projects are served by LADWP, same as the Project Site, and thus are counted as part of cumulative analysis. As shown in Table 3.19-4, Cumulative Estimated Electricity Demand, the cumulative projects would demand approximately 70,982,366 kw-h/year (71 gw-h/year) of electricity. The LADWP forecasts that in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8.242 gw-h and commercial uses consisting of 12.413 gw-h. The peak demand would be 5,650 megawatts (mw).<sup>262</sup> The cumulative Related Projects' annual electricity consumption would represent approximately 0.27 percent of the forecasted electricity demand in 2018-19.<sup>263</sup> Thus, there is adequate supply capacity to serve the cumulative projects. Thus, the cumulative projects are within the anticipated demand of the LADWP system. In other words, there is adequate energy capacity to service the Project and the related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each related project would be required to be in compliance with Title 24 of the CCR

<sup>262</sup> LADWP, 2014 IRP, Table A-1, page A-5: [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-doc?\\_afdf.ctrl-state=9kjcyeafd\\_4&\\_afLoop=1178238919540287](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_afdf.ctrl-state=9kjcyeafd_4&_afLoop=1178238919540287).

<sup>263</sup>  $71 / 26,687 \times 100\% = 0.27\%$

(CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each related project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts would be less than significant.

**Table 3.19-4  
Cumulative Estimated Electricity Demand**

Land Use	Size	Electricity Rates	Total (kw-h / yr)
Residential	4,865 units	5,626.5 kw-h / unit	27,372,922
Office	897,701 sf	12.95 kw-h / sf	11,625,227
Retail	523,154 sf	13.55 kw-h/sf	7,088,737
Hotel	134 rooms	9.95 kw-h / sf	533,320
Restaurant	49,014 sf	47.45 kw-h / sf	2,3425,714
Industrial and Warehouse	-77,849 sf	4.35 kw-h/sf	-338,643
<b>Related Projects</b>			<b>69,707,277</b>
<b>Proposed Project</b>			<b>1,275,089</b>
<b>Cumulative (Related + Project)</b>			<b>70,982,366</b>
<i>sf = square feet; kw-h = kilowatt-hour; yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Hotel Rooms: average budget room is 300 to 400 square feet. <a href="http://www.dimensionsinfo.com/hotel-room-size/">http://www.dimensionsinfo.com/hotel-room-size/</a>.</i> <i>This analysis assumes 400 square feet per room.</i> <i>School – 95 square feet per student: <a href="http://www.cde.ca.gov/ls/fa/sf/completesch.asp">http://www.cde.ca.gov/ls/fa/sf/completesch.asp</a></i> <i>Table: CAJA Environmental Services, January 2017.</i>			

## Natural Gas

All of the related projects are served by the same natural gas service as the Project (SCG). The Project's contribution to the cumulative natural gas demand would not be substantial. Therefore, Project impacts to natural gas demand would not be cumulatively considerable or significant. These estimates do not account for energy reduction features employed by the Project or related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, each related project would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

As shown in Table 3.19-5, Cumulative Estimated Natural Gas Demand, the cumulative projects are estimated to demand approximately a net increase of 24.4 million cf/month of natural gas (or 0.816

million cf/day). The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the cumulative projects' energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2019 is estimated at 3,008 million cf/day.<sup>264</sup> The increase of 0.816 million cf/day represents approximately 0.025 percent of the 2019 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The related projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

**Table 3.19-5  
Cumulative Estimated Natural Gas Demand**

<b>Land Use</b>	<b>Size</b>	<b>Natural Gas Rates</b>	<b>Total (cf / mo)</b>
Residential	4,865 units	4,011.5 cf / unit	19,515,947
Office	897,701 sf	2.9 cf / mo	2,603,333
Retail	523,154 sf	2.9 cf / mo	1,517,147
Hotel	134 rooms	4.8 cf / sf	257,280
Restaurant	49,014 sf	2.9 cf / mo	142,141
Industrial and Warehouse	-77,849 sf	2.9 cf / mo	-225,762
<b>Related Projects</b>			<b>23,810,086</b>
<b>Proposed Project</b>			<b>661,610</b>
<b>Cumulative (Related + Project)</b>			<b>24,471,696</b>

<sup>264</sup> <https://www.socalgas.com/regulatory/cgr.shtml>



**Table 3.19-5  
Cumulative Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Rates	Total (cf / mo)
<i>sf = square feet; cf = cubic feet; mo = month</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Hotel Rooms: average budget room is 300 to 400 square feet. <a href="http://www.dimensionsinfo.com/hotel-room-size/">http://www.dimensionsinfo.com/hotel-room-size/</a>.</i> <i>This analysis assumes 400 square feet per room.</i> <i>Table: CAJA Environmental Services, January 2017.</i>			

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

**Less Than Significant Impact.** A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

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