




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

Mitigated Negative Declaration

17346 Sunset Project

Case Number: ENV-2018-505-MND
CPC-2018-504-DB-DRB-SPP-CDP-MEL

DOCUMENT FILED City Clerk's Office	NG-19-025-12	No:	Certified by 	Date: 6-18-19
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Project Location: 17346 Sunset Boulevard, Los Angeles, California, 90272

Community Plan Area: Brentwood-Pacific Palisades

Council District: 11—Bonin

Project Description: The Project Site is bounded on the northwest by Sunset Boulevard, on the northeast by single story commercial structures on the southwest by a supermarket shopping center, and on the southeast by a steep slope covered with vegetation and climbing approximately 40 feet above the level of the Site. The Site covers a total of 14,963 square feet of lot area. The Site is improved with a single story commercial structure previously used as a fast-food restaurant and a surface parking lot. The restaurant has been closed for approximately two years. The Project will involve demolition of the existing vacant fast-food restaurant and construction of a 5-story, 60-foot, 9-inch mixed-use development containing 40 dwelling units and approximately 2,900 square feet of commercial uses with one subterranean parking level. A retaining wall will be integrated into the southeast face of the building abutting a steep incline. The total project area is 32,225 square feet with a floor area ratio of 2.15:1.

The Applicant requests the following discretionary actions: Two **Off-Menu Density Bonus Incentives** pursuant to Government Code section 65915 and LAMC section 12.22 A.25(g)(3) to permit a maximum height of five stories and 60 feet, 9 inches in lieu of the two-story, 30-foot height restriction imposed by Section 7 of the Pacific Palisades Specific Plan, and an FAR of 2.15:1 in lieu of the maximum FAR of 1:1 set forth in Section 8 of the Specific Plan; A **Project Permit Compliance** pursuant to LAMC section 11.5.7 to permit a project in the Pacific Palisades Specific Plan area; A **Coastal Development Permit** pursuant to LAMC section 12.20.2 for a project in the California Coastal Zone; A **Design Review** pursuant to LAMC section 16.50 E to determine the project is in compliance with the Pacific Palisades Specific Plan; and A **Mello Act Compliance determination** pursuant to California Government Code section 65590 and 65590.1 for projects located within the California Coastal Zone. In addition to the foregoing discretionary actions, the Project is requesting the following ministerial actions: (1) a 6% affordable housing density bonus; and (2) Parking Option 1, pursuant to LAMC Section 12.22 A.25.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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315, Van Nuys, CA 91406

APPLICANT:

California Food Managers, LLC
6404 Wilshire Boulevard, Suite
999, Los Angeles, CA 90048

June 2019

MITIGATED NEGATIVE DECLARATION

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	11 - Bonin	June 2019

RESPONSIBLE AGENCIES

None

PROJECT TITLE / CASE NO.	RELATED CASES
17346 Sunset Project	ENV-2018-505-EAF CPC-2018-504-DB-DRB-SPP-CDP-MEL

PROJECT LOCATION

17346 Sunset Boulevard, Los Angeles, California, 90272

APPLICANT NAME AND ADDRESS	PHONE NUMBER
California Food Managers, LLC 6404 Wilshire Boulevard, Suite 999, Los Angeles, CA 90048	(213) 279-6965

PROJECT DESCRIPTION:

The Site is improved with a single story commercial structure previously used as a fast-food restaurant and a surface parking lot. The restaurant has been closed for approximately two years. The Project will involve demolition of the existing vacant fast-food restaurant and construction of a 5-story, 60-foot, 9-inch mixed-use development containing 40 dwelling units and approximately 2,900 square feet of commercial uses with one subterranean parking level. A retaining wall will be integrated into the southeast face of the building abutting a steep incline. The total project area is 32,225 square feet with a floor area ratio of 2.15:1.

The Applicant requests the following discretionary actions: Two **Off-Menu Density Bonus Incentives** pursuant to Government Code section 65915 and LAMC section 12.22 A.25(g)(3) to permit a maximum height of five stories and 60 feet, 9 inches in lieu of the two-story, 30-foot height restriction imposed by Section 7 of the Pacific Palisades Specific Plan, and an FAR of 2.15:1 in lieu of the maximum FAR of 1:1 set forth in Section 8 of the Specific Plan; A **Project Permit Compliance** pursuant to LAMC section 11.5.7 to permit a project in the Pacific Palisades Specific Plan area; and A **Coastal Development Permit** pursuant to LAMC section 12.20.2 for a project in the California Coastal Zone. In addition to the foregoing discretionary actions, the Project is requesting the following ministerial actions: (1) a 6% affordable housing density bonus; and (2) Parking Option 1, pursuant to LAMC Section 12.22 A.25.

ENVIRONMENTAL SETTING:

The Project Site is bounded on the northwest by Sunset Boulevard, on the northeast by single story commercial structures on the southwest by a supermarket shopping center, and on the southeast by a steep slope covered with vegetation and climbing approximately 40 feet above the level of the Site. The Site covers a total of 14,963 square feet of lot area.

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

Yes, consultation began on February 21, 2018.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

-
- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
-
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
-
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
-
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
-

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

Kenton Trinh

PRINTED NAME

City Planning Associate

TITLE



SIGNATURE

(213) 978-1290

TELEPHONE NUMBER

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

Mitigated Negative Declaration

Attachment A – Project Description

This section includes information from, which are included as Appendix A to this MND:

A-1 Plans, Farzin Maly, September 21, 2018

A-2 Landscape Plans, Shadley Design, October 5, 2018

1. Environmental Setting

a) Project Location

The Project Site is located in the Brentwood-Pacific Palisades Community Plan area of the City of Los Angeles on the south side of Sunset Boulevard, just north of CA-1 Pacific Coast Highway (PCH). The Pacific Ocean is approximately 750 feet south of the Site.

See **Figure A-1, Regional Map**, for the location of the Project within the context of the City.

See **Figure A-2, Aerial Map**, for an aerial view of the Site and the immediate surrounding area.

b) Existing Conditions

The Project Site is improved with a single story commercial structure of 1,860 square feet, previously used as a Jack in the Box restaurant and a surface parking lot. The restaurant has been close for approximately two years. The Site contains ornamental vegetation and trees, mostly on a sloping portion in the rear. Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree). There are no protected trees on the Site.¹

c) Planning and Zoning

The Project Site's APNs, zoning, land use designation, and lot size are listed on **Table A-1, Project Site**. The Project Site consists of one parcel covering 14,962.6 square feet of lot area (0.34 acres). The Project Site designated as Neighborhood Office Commercial under the General Plan and Commercial under the Brentwood-Pacific Palisades Community Plan (the Community Plan). The Project Site is also subject to the Pacific Palisades Commercial Village and Neighborhoods Specific Plan (the Specific Plan) in subarea Neighborhood Area B (Sunset Boulevard at PCH). The Specific Plan establishes the approximately 1,500-foot stretch of Sunset Boulevard between Pacific Coast Highway and Los Liones Drive, which includes the Project Site, as one of several "significant commercial areas in the Pacific Palisades...compatible with the surrounding residential community..."

¹ Landscape Plans, Shadley Design, October 5, 2018.

The Project Site is zoned C2-1VL. Pursuant to the General Plan and LAMC sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum residential density within the C2 zone is one unit for every 400 square feet of lot area. While the 1VL height district would typically allow an FAR of 1.5:1 and a height of three stories and 45 feet, the Specific Plan limits FAR to 1:1 and the maximum allowed height is two stories and 30 feet.

Table A-1
Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
17346 W. Sunset Boulevard	4415-018-018	C2-1VL	Neighborhood Office Commercial	14,963
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org , December 2017.				

d) Public Transit

The intersection of Sunset Boulevard and Pacific Coast Highway provides stops for LA Metro Bus Route 534. Immediately adjacent to the Site is a stop for LA Metro Bus Route 602. Route 534 provides direct access to coastal destinations between West Malibu and Santa Monica, as well as several stops in downtown Santa Monica. From downtown Santa Monica, riders can catch the Metro Expo Line, which provides rail service to downtown Los Angeles with stops in West Los Angeles, Culver City, Jefferson, and USC.

LA Metro Bus Route 602 provides direct access to major destinations between Pacific Palisades and Brentwood, Westwood and UCLA. Given the existing transit service, the Site is an ideal location for a mixed-use development providing both housing and employment opportunities in close proximity to transit.

e) Surrounding Land Uses

The Project Site is located along Sunset Boulevard, a commercial corridor defining a subarea of the Specific Plan area within the Pacific Palisades community.² Sunset Boulevard terminates at Pacific Coast Highway approximately 685 feet southwest from the Site's southwest boundary. Sunset Boulevard is designated by the Los Angeles Mobility Plan 2035 as an Avenue I, with a minimum 110-foot wide right-of-way and a minimum 70 wide roadway. The portion of Sunset Boulevard fronting the Site satisfies the Avenue I dimensions, and no dedication will be required.

Uses along that stretch of Sunset Boulevard include shopping centers, a synagogue, a gas station, multi-story residential and mixed-use developments, and a multi-story office building. The road is bounded on either side by steep, upward slopes. Higher on those slopes are residential developments ranging from five to nine stories in height.

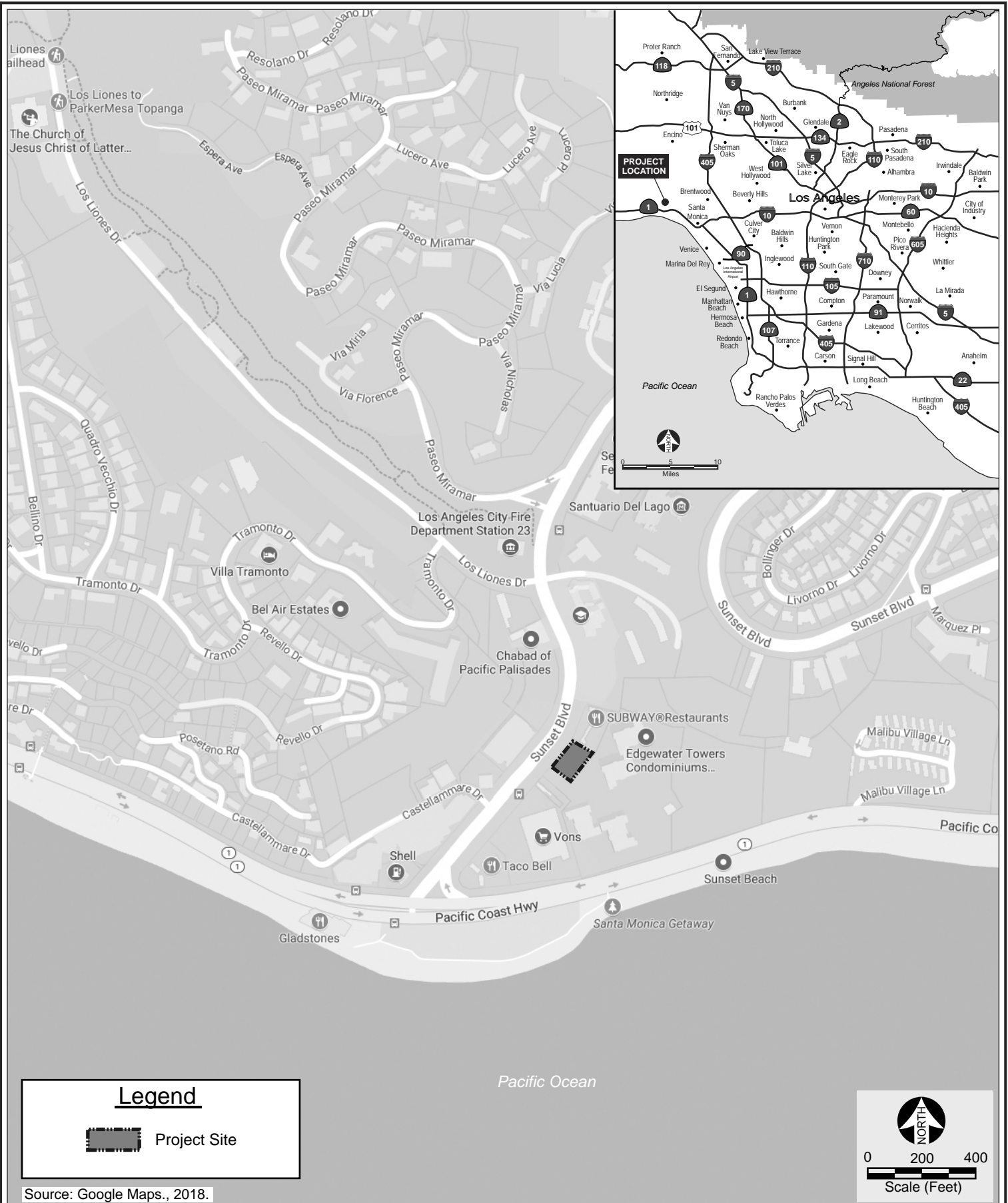
The Project Site is bounded as follows:

- West across Sunset Boulevard (Avenue I in Mobility Plan 2035) is a 6-story, multi-use

² The Specific Plan is divided into the Pacific Palisades Commercial Village and three neighborhood areas, A, B, and C. The Property is situated within Neighborhood Area B.

development (zoned C2-1XL)

- Northeast is a 1-story strip mall-type shopping center (zoned C2-1VL)
- South is a driveway to the adjacent multi-family development (zoned C2-1VL) and a Von's supermarket (zoned C2-IXL).
- Southeast is a steep slope covered with vegetation and climbing approximately 40 feet above the grade level of the Site. Atop the crest of the slope is a 9-story multi-family housing development (zoned [Q]R3-1).





2. Project Description

a) Project Overview

The Project will convert a vacant fast food establishment and surface parking lot into a new mixed-use structure. The Project is a mixed-use building encompassing approximately 2,900 square feet of ground floor commercial uses along Sunset Boulevard, as well as 40 dwelling units in the building's four additional stories. Four of the Project's dwelling units, representing 10% of the base density, will be restricted to households of very low income. The Project's unit mix will provide 39 studio and one-bedroom units and 1 two-bedroom unit. The Project will also include one subterranean parking level.

Table A-2, Project Information, provides details about the Project.

Table A-2
Project Information

Uses	Type	Total
Residential	Studio – 8 units 1-bedroom – 31 units 2-bedroom – 1 units	40 units
Commercial	2,900 sf retail	2,900 sf
Source: <u>Plans</u> , Farzin Maly, September 21, 2018.		

(1) Floor Area and Density

The Site has a residential base density of 38 dwelling units by virtue of its C2 zoning.

The Specific Plan specifically allows mixed-use projects. Section 6(B) of the Specific Plan provides that residential uses may occupy the upper floors of a building as long as certain design standards prescribed within the Specific Plan are satisfied. The Project will comply with the Specific Plan in all respects except for building height and FAR, for which waivers have been requested as density bonus incentives.

In addition to a ministerial affordable housing density bonus of 6%, implementation of the Project will require multiple discretionary approvals. Specifically, the Applicant requests a Coastal Development Permit and Project Permit Compliance for a Project located within the Specific Plan Area. The Applicant also requests a waiver from two aspects of the Specific Plan pursuant to Government Code section 65915(e) and LAMC section 12.22 A.25(g)(3): two off-menu density bonus incentives to permit a height of five stories and 60 feet, 9 inches in lieu of the Specific Plan's maximum of two stories and 30 feet, and an FAR of 2.15:1 in lieu of the Specific Plan's maximum 1:1 FAR.

Situated on a lot of approximately 14,963 square feet, the Project will contain approximately

32,225 total square feet of floor area, giving the Project an FAR of approximately 2.15:1.³ Projects in the Specific Plan are allowed a by-right FAR of 1:1. The Project will achieve its proposed floor area ratio by utilizing an off-menu density bonus incentive.

Table A-2, Floor Area, provides details about the Project.

**Table A-2
Floor Area**

Level	Use	Quantity	Area
Basement	Parking	19 spaces	-
1	Parking	14 spaces	-
	Commercial	-	2,900 sf
2	Parking	16 spaces	-
	Residential	5 units	4,762 sf
3	Residential	12 units	8,324 sf
4	Residential	12 units	8,324 sf
5	Residential	11 units	7,915 sf
Total			32,225 sf
Source: Plans, Farzin Maly, September 21, 2018.			

(2) Height

The Project Site is zoned C2-1VL. Pursuant to the General Plan and LAMC sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum residential density within the C2 zone is one unit for every 400 square feet of lot area. While the 1VL height district would typically allow an FAR of 1.5:1 and a height of three stories and 45 feet, the Specific Plan limits FAR to 1:1 and the maximum allowed height is two stories and 30 feet.

The Project is proposed to be five stories and 60 feet, 9 inches in height. Project implementation will require a second off-menu density bonus incentive to accommodate the Project's height.

b) Design and Architecture

The Project would appear as an integrated single structure with articulation and variation created by the massing of individual components. Parking spaces within the building, ground level commercial uses and residential units located within the building have been integrated into the overall architectural theme of the Project to create a sculpted appearance, particularly as seen from the nearby neighborhood. Overall variation in building appearance is created with the use of various materials and massing of the ground level uses, the placement of residential units along the perimeter of the Podium, the landscaped ground floor, and the transition of the first floor commercial to upper level residential.

³ FAR is calculated by dividing the Project's total floor area by the Property's buildable area. In the C2 zone, the Property's buildable area is equal to its lot area unless a D Limitation restricting floor area was imposed prior to July 1, 1997. No such D limitation has been imposed upon the Property.

The Project's approximately 2,900 square feet of commercial space will be located on the Project's first floor as required by Section 6(B) of the Specific Plan.

A retaining wall will be integrated into the southeast face of the building abutting a steep incline.

The Project is similar in size and scale to multi-story structures in the vicinity of the Property. The Project will be lower than the condominium towers atop the steep slope at the eastern boundary of the Site. With a grade level approximately forty feet higher than the Project, the five- and nine-story towers located at 17350 through 17368 Sunset Boulevard, and 17171 and 17201 Pacific Coast Highway, exceed the height of the Project by a considerable margin.

c) Open Space and Landscaping

Table A-3, Open Space, provides the amount of required and provided open space. The Project's roof deck provides a total of 4,161 square feet of common open space on the roof deck, meeting the LAMC's open space requirements for a 40-unit residential building.

**Table A-3
Open Space**

Use	Rate	Quantity	Total (sf)
Required			
1 Habitable Room	100 sf per unit	8 units	800
2 Habitable Room	100 sf per unit	31 units	3,100
3 Habitable Room	125 sf per unit	1 units	125
Total Required			4,025
Provided			
Total Provided			4,161
Source: Plans, Farzin Maly, September 21, 2018.			

As shown in **Appendix A-2**, landscaping will be provided around the Site, along the driveways, along the Sunset Boulevard frontage, and on the rooftop. The Project is required to provide 1 24-inch box tree per 4 units (or 10 trees). The Project would provide 15 24-inch box trees.

d) Access, Circulation, and Parking

(a) Access and Circulation

Vehicular access would be provided via two driveways on Sunset Boulevard at the northwest and southwest corners of the Site. One driveway will be an enter-only driveway and the other will be an exit-only driveway.

Internal circulation would allow vehicles to access the basement, level 1, and level 2 parking areas.

Ingress and egress are located in the front of the building as well as the first floor parking area.

(b) Vehicle Parking

Table A-4, Parking, provides the amount of required and provided vehicle parking.

**Table A-4
Vehicle Parking**

Use	Rate	Quantity	Total (spaces)
Required			
Studio	1 per unit	8 units	8
1-bedroom	1 per unit	31 units	31
2-bedroom	2 per unit	1 unit	2
10% Reduction in Parking with Bicycle (Residential)			(4)
Required (Residential)			37
Commercial	1 per 300 sf	2,900 sf	10
Required (Commercial)			10
Total Required			47
Provided			
Provided (Residential)			37
Provided (Commercial)			12
Total Provided			49
Source: Plans, Farzin Maly, September 21, 2018.			

Because it qualifies for an affordable housing density bonus, the Project will utilize Option 1 under LAMC section 12.22 A.25(d)(1) for calculating the number of on-site motor vehicle parking spaces to provide for residential uses. Projects proceeding under Option 1 must provide one parking space for each dwelling unit containing zero to one bedroom, and two parking spaces for each dwelling unit containing two to three bedrooms.

The 39 studio and one-bedroom units will require one parking space each, and the one two-bedroom unit, will require two parking spaces. The Project will therefore require a total of 41 parking spaces in the absence of credits for bicycle parking. Four of the 41 required parking spaces have been replaced by bicycle parking stalls pursuant to LAMC section 12.21 A.4. The Project will therefore provide 37 spaces for residential uses; 37 residential spaces will be provided.

The Specific Plan dictates the number of on-site vehicle parking spaces required for the Project's commercial uses. According to Section 10 of the Specific Plan, one parking space must be provided for every 300 square feet of retail and service commercial uses. The Project's 2,900 square feet of commercial area will therefore require 10 parking spaces. The Project is exceeding that requirement by providing 12 parking spaces for its commercial uses, for a Project total of 49 parking spaces.

(c) Bicycle Parking

Table A-5, Bicycle Parking, provides the amount of required and provided bicycle parking.

**Table A-5
Bicycle Parking**

Use	Rate	Quantity	Total (spaces)
Required			
Residential	2 per 1,000 sf zoning area	29,325 sf	59
Commercial	2 per 1,000 sf zoning area	2,900 sf	6
Total Required			65
Provided			
Basement			58
First Floor			7
Total Provided			65
Source: <u>Plans</u> , Farzin Maly, September 21, 2018.			

e) Lighting and Signage

Project Site signage would include building identification, wayfinding, and security markings. Commercial and residential signage would be similar to other signage in the Project vicinity and no off-site signage is proposed.

Exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting would be integrated into the overall architectural and landscape themes for the Project.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses.

f) Site Security

The Project would provide an extensive security program to ensure the safety of its residents, commercial operations and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas; lighting of building entryways and plaza areas; staff training in safety and sound security policies; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems.

g) Sustainability Features

The Project will comply with the 2017 Los Angeles Green Building Code (LAGBC),⁴ which builds upon and sets higher standards than those in the 2016 California Green Building Standards Code (CalGreen, effective January 1, 2017).⁵

The Project will comply with the requirements for renewable energy and solar-ready buildings per LAMC section 99.04.211, which require all buildings to comply with the California Energy Code (CCR), Title 24, Part 6, sections 110.10(b) through 110.10(d). The 2019 Building Energy Efficiency Standards for solar panels will go into effect on January 1, 2020 (for building permit applications submitted on or after that date).

Further considerations regarding energy efficiency and sustainability include native plants and drip/subsurface irrigation systems, individual metering or sub metering for water use, leak detection systems, and provisions for electric vehicle charging.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for residents and visitors. The Project would also promote bicycle transportation by replacing 10 percent of the required vehicle parking with bicycle parking spaces pursuant to LAMC section 12.21 A.4.

h) CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, the MND will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the MND.

i) Anticipated Construction Schedule

The estimated construction schedule is shown in **Table A-6, Construction Duration**.

**Table A-6
Construction Duration**

Phase	Duration
Demolition	2 weeks
Grading	2 months
Construction	12 months
Architectural Coatings	3 months
Total	15.5 months
Construction schedule, including start, end, and duration dates are estimates only. CAJA Environmental Services, January 2018.	

⁴ LA Department of Building and Safety: <http://ladbs.org/forms-publications/forms/green-building>

⁵ California Building Codes: <http://www.bsc.ca.gov/Codes.aspx>

The Project would demolish the existing 1,860 square foot building and approximately 6,000 square feet of existing surface asphalt.

Construction of the Project is anticipated to require the export of approximately 10,700 cubic yards of earth. However, the impact analysis provided in this document is premised on an assumed export volume of 20,000 cubic yards in order to provide a conservative evaluation.

The Project will contain one subterranean level of approximately 10 feet in addition to any other excavation typically required for foundation and utility work.

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. It is anticipated that the export will be transported to the Sunshine Canyon Landfill in Sylmar, CA approximately 32 miles away. The possible route from the Site: south on Sunset to east on PCH to east on I-10 to north on I-405. Trucks would do the reverse to access the Site. This route avoids residential neighborhoods, and uses the largest capacity roads and nearest direct route to the freeway.

j) Requested Permits and Approvals

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

Two **Off-Menu Density Bonus Incentives** pursuant to Government Code section 65915 and LAMC section 12.22 A.25(g)(3) to permit a maximum height of five stories and 60 feet, 9 inches in lieu of the two-story, 30-foot height restriction imposed by Section 7 of the Specific Plan, and an FAR of 2.15:1 in lieu of the maximum FAR of 1:1 set forth in Section 8 of the Specific Plan;

A **Project Permit Compliance** pursuant to LAMC section 11.5.7 to permit a project in the Pacific Palisades Specific Plan area; and

A **Coastal Development Permit** pursuant to LAMC section 12.20.2 for a project in the California Coastal Zone;

A **Design Review** pursuant to LAMC section 16.50 E to determine the project is in compliance with the Pacific Palisades Specific Plan; and

A **Mello Act Compliance determination** pursuant to California Government Code section 65590 and 65590.1 for projects located within the California Coastal Zone.

In addition to the foregoing discretionary actions, the Project is requesting the following ministerial actions: (1) a 6% affordable housing density bonus; and (2) Parking Option 1, pursuant to LAMC Section 12.22 A.25. Finally, the Project will require a haul route permit due to its location in a designated special grading area.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permit, excavation permits, foundation permits, building permits, and sign permits.

MITIGATED NEGATIVE DECLARATION

Attachment B - Explanation of Checklist Determinations

I. Aesthetics

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS					
Except as provided in Public Resources Code Section 21099, would the project:					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<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"/>

a) 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. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is in a gentle sloping area along a commercial corridor (Sunset Boulevard). Views in the vicinity of the Project Site are largely constrained by the existing structure on the Project Site and structures on adjacent parcels.

CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.¹ Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual

¹ 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., (2004), 116 Cal.App.4th 396 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, (2004), 119 Cal.App.4th 477 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"].

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.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Sunset provides the major north-south view corridor. Scenic or natural setting views such as the Pacific Ocean are visible from the public sidewalk along the Site. These views would not be substantially affected by the Project since the public sidewalk would remain.

The Project would appear as an integrated single structure with articulation and variation created by the massing of individual components. Parking spaces within the building, ground level commercial uses and residential units located within the building have been integrated into the overall architectural theme of the Project to create a sculpted appearance, particularly as seen from the nearby neighborhood. Overall variation in building appearance is created with the use of various materials and massing of the ground level uses, the placement of residential units along the perimeter of the Podium, the landscaped ground floor, and the transition of the first floor commercial to upper level residential.

The Project is similar in size and scale to multi-story structures in the vicinity of the Property. The Project will be lower than the condominium towers atop the steep slope at the eastern boundary of the Site. With a grade level approximately forty feet higher than the Project, the five- and nine-story towers located at 17350 through 17368 Sunset Boulevard, and 17171 and 17201 Pacific Coast Highway, exceed the height of the Project by a considerable margin.

No designated scenic vistas in the local area would be impeded, and the Project would not substantially block any scenic vistas. Therefore, impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated 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 rock outcroppings located on-site.

The Project Site is not located along a designated scenic highway, corridor, or parkway.² Pacific Coast Highway (PCH) is a State Scenic Highway for its entire alignment north of I-10.³ PCH is 675 feet south of the Site and no part of the Project fronts the scenic highway.

The Site contains neither protected trees nor trees that are subject to the City's Tree Replacement Program.

² California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm

³ Mobility Element 2035: <http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF>

There are no historic buildings on the Project Site.⁴ Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

The Project Site is located in an urbanized area.

Compatibility with Character of Surrounding Community

The Project would create a mixed-use residential and commercial development in an area which has multiple residential, commercial, and office uses, as well as restaurants. The Project features ground floor commercial designed to activate Sunset and enhance the overall pedestrian experience. The Project has uses that would be similar to those already found in the area to provide additional synergy with patrons, customers, and visitors throughout the day and night. The residential use will respond directly to the market demand for high-quality accommodations.

Transit lines with stops within a 1/8th of a mile of the Site provide access to employment nodes in Westwood Village/UCLA, Santa Monica, Century City, Koreatown, and Downtown Los Angeles. Only about 12 percent of the potential infill sites in California are within a quarter of a mile of a high-frequency bus line⁵ making this site ideal for redevelopment.

Another unique advantage of this Site is its relationship to single family uses. This commercially zoned site is over 400 feet from the closest single-family zoned (R1 or RE) site. It is abutting R3 zoned property, creating a stair stepping transition from the more intense commercial corridor through a medium density multi-family zone to single family zones internal to the area.

The proximity of this largely residential project (approximately 90% of the requested floor area) allows Project residents the opportunity to walk or bike to services offering yet another opportunity to reduce their vehicle miles travelled. The Project's neighborhood-serving commercial component in turn offers area residents and employees the opportunity to reduce their vehicle miles traveled by providing uses nearby.

The Project will promote use of the currently under-utilized parcel (most of the Project Site is surface parking lot or slope), generating customer opportunities for the existing businesses in the area. The Project will be compatible with and complementary to the surrounding community because it would combine uses already found in the immediate area.

⁴ <http://navigatela.lacity.org/navigatela/> and <http://historicplacesla.org/map>

⁵ Housing Policy Debate, Vol. 17 Issue 4 "The Future of Infill Housing in California: Opportunities, Potential, and Feasibility" supra p. 695.

A mixed-use development in a contemporary, visually integrated building would contribute to the characteristics as a walkable, mixed-use urban district and would, therefore, be compatible with the character of the surrounding community. As a whole, the Project's building orientations would be sited to improve the neighborhood character and pedestrian environment, which is a significant change from the vacant and single-use development that exists today.

Architectural Style and Design

With respect to building mass and height, land uses within the Project vicinity vary in use and height. Within the area are commercial retail, office, restaurant, parking, residential, and mixed-use land, uses ranging in heights. Development within the proximity of the Project Site are low-rise in height, with buildings ranging from 1 to 5 stories in height close to the Project Site. The proposed building would be 5 stories. There are buildings up to 9 floors on the adjacent bluff east of the Site.

The Project design has a unique and distinctive character that will stand out without being out of place. The Project provides significant vertical and horizontal articulation, which creates a distinctive design when compared to development in the area. The building's massing is consistent with the existing built environment. The ground level fronting along Sunset is dedicated to neighborhood-serving commercial uses in addition to its enhanced pedestrian streetscape. All of these elements combine to promote pedestrian activity in the area, and the commercial uses will benefit the surrounding community.

The Project will provide code required off-street automobile and bicycle parking hidden from view on the grade level and below ground together with code required long term and short term bicycle parking.

Views

At a height of approximately 60 feet, 9 inches above grade, the proposed building may be visible from private viewpoints within commercial or residential buildings in the neighborhood. It should be noted that private views are not protected by any viewshed protection ordinance, and the alteration of private views would not constitute a significant impact under CEQA. The visual impact of one building blocking another building is not considered a significant impact because the general characteristics of the urban setting would not be altered.

For all the foregoing reasons, the Project would enhance, not degrade, the visual character or quality of the Project Site and its surroundings and, therefore, the Project's impacts on the visual character of the Project Site and its surroundings would be less than significant.

Other visual and aesthetic considerations

The Project would be landscaped according to LAMC Section 12.40 and 12.41. The landscape design has been developed to connect the Project to the surrounding development.

While the Project Site is under construction, construction walls and barriers would be erected to protect the Site from vandalism. The Project shall comply with LAMC Section 91.6205, which regulates signage on construction barriers.

During operation, the Project would 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 LAMC Section 91.8104.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

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

Less Than Significant Impact.

A significant impact may occur if 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 are 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.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential and commercial uses. Vehicle headlights from traffic contribute to overall ambient lighting levels. The Project would create additional sources of light.

The Project would construct a new building and interior lighting through windows would increase as compared to the existing setting. Also the residential nature of the Project would create additional lighting into the night hours. The Project would provide illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Project 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 and 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.

The Project would include architectural features and facades with a low level of reflectivity. The ground floor commercial area would have low reflectivity to allow greater visual access into the building and appeal to a pedestrian aesthetic. Upper floor windows would be less visible to the pedestrian environment and would be suitably shielded to prevent visual trespass and allow privacy to the residential spaces. As such, the Project would not result in a substantial amount of light that would adversely affect the day or night-time views in the Project vicinity. 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 location 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.

Furthermore, due to its close proximity with surrounding residential and commercial buildings, the Project would utilize outdoor lighting designed and installed with shielding to reduce light-sourced impacts surrounding the Project Site. Therefore, 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.

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. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have a façade of plaster, glass, and painted metal. The parking structure is subterranean and contained within the building, to provide a shield so that light from vehicles and building lighting does not project upwards. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. Therefore, impacts would be less than significant.

II. Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FOREST RESOURCES					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact.

The 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, and the General Plan land use designation for the Site is Neighborhood Office Commercial. The Project Site is developed with a building and surface parking. The Project Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.⁶ Therefore, no impact would occur.

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

No Impact.

⁶ California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, April 4, 2019.

The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.⁷ The Project would not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project would not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Project Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

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

No Impact.

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

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

No Impact.

The Project Site is 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 would occur.

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

No Impact.

A significant impact may occur if a project involves 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 in an area of the City that is highly urbanized. Neither the Project Site nor 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 would occur.

⁷ California Department of Conservation, Williamson Act Program, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed April 4, 2019.

III. Air Quality

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY					
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
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.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

B Air Quality and Greenhouse Gases Appendices, DKA Planning, February 2018.

a) Conflict with or obstruct implementation of an 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 2016 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2016 AQMP on March 3, 2017.⁸ 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.⁹

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 (O₃), nitrogen monoxide and dioxide (NO and NO₂), sulfur dioxide (SO₂), particulate matter 2.5 microns or less

⁸ <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>

⁹ SCAQMD, <http://www.aqmd.gov/nav/about>.

in diameter (PM_{2.5}), particulate matter ten microns or less in diameter (PM₁₀), 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 conditions, a typical situation at dusk in urban areas between November and February.¹⁰ 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 (O₃) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O₃ 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_x, the components of O₃, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ 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 O₃ 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 NO₂) like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ 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 NO₂ 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 (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls

¹⁰ 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.

placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ 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_{2.5}, is 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_{2.5} can be formed in the atmosphere from gases such as SO₂, NO_x, and VOC. Inhalable particulate matter, or PM₁₀, is about 1/7 the thickness of a human hair. Major sources of PM₁₀ 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_{2.5} and PM₁₀ 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_{2.5} and PM₁₀ 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 PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} 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 the State. As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, 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 B.3-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O₃ and PM_{2.5}, attainment for PM₁₀, and attainment/unclassified for CO and NO₂.

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 B.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 B.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 ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	/a/	0.079 ppm (137 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Maintenance
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	12 µg/m ³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Maintenance
	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Nonattainment
/a/ CARB has not determined 8-hour O ₃ attainment status. Source: CARB, Ambient Air Quality Standards, and attainment status, accessed December 13, 2018 (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 regularly prepares an AQMP to address CAA and CCAA requirements by identifying policies and control measures. On March 3, 2017, the SCAQMD adopted the 2016 AQMP, which includes strategies to meet the NAAQS for the 8-hour ozone standard by 2032, the annual PM_{2.5} standard by 2021-2025, the 1-hour ozone standard by 2023, and the 24-hour PM_{2.5} standard by 2019. 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.

The Southern California Association of Governments (SCAG) assists in air quality planning efforts 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 April 2016, SCAG adopted its 2016-2040 RTP, a plan to invest \$556.5 billion in transportation systems over a six-county region.

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. 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.

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 NO₂ 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 NO₂ 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. NO₂ 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 B.3-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2014 through 2016. The one-hour State standard for O₃ was exceeded three times during this three-year period while the daily federal standard was exceeded four times. CO and NO₂ levels did not exceed the CAAQS from 2014 to 2016.

**Table B.3-2
Ambient Air Quality Data In Project Vicinity**

Pollutant	Pollutant Concentration & Standards	Northwest Coastal LA County		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.116	0.102	0.085
	Days > 0.09 ppm (State 1-hour standard)	1	2	0
	Days > 0.075 ppm (Federal 8-hour standard)	4	0	0
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	2.0	1.6	2.2
	Days > 20 ppm (State 1-hour standard)	0	0	0
	Maximum 8-hour Concentration (ppm)	1.3	1.4	1.1
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0639	0.0676	0.0545
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM ₁₀	Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
	Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM _{2.5}	Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
	Days > 35 µg/m ³ (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide	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 (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed January 25, 2018. 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 3, which translates into a risk of about 300,000 in 1 million. One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, 30 percent were related to diet and obesity, and about two percent were associated with environmental pollution related exposures. The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 30-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 30-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 study concluded that the average of the modeled air toxics concentrations measured at monitoring stations in the Basin equates to a background cancer risk of approximately 897 in one million primarily due to diesel exhaust particulate matter (DPM). The Project Site itself has an estimated ambient background risk of 576 in one million.¹¹

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

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.

Existing Emissions

The Project Site includes a 1,860 square-foot fast food restaurant, drive-through, and surface parking. However, the restaurant has been closed for over two years. As such, this analysis assumes there are no anthropogenic emissions from the site.

¹¹ South Coast Air Quality Management District, MATES IV Carcinogenic Risk Interactive Map, <http://www3.aqmd.gov/webappl/OI.Web/OI.aspx?jurisdictionID=AQMD.gov&shareID=73f55d6b-82cc-4c41-b779-4c48c9a8b15b> accessed January 31, 2018.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan

The proposed residential and commercial land uses will neither conflict with the SCAQMD's 2016 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 2016 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 2016 RTP/SCS accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Brentwood-Pacific Palisades Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 64,619 persons and housing base of 30,060 units by 2010.¹² The City has not updated projections beyond 2010 for the Community Plan area.

The Project would demolish a vacant building and develop 40 residential units in the City of Los Angeles. The Project could add 97 residents to the Plan area, based on the City's projected household density. See **Table B.3-3**. This would marginally increase population in the South Coast Air Basin. The Project Site is classified as "Neighborhood Office Commercial" in the General Plan and "Commercial" under the Community Plan, a zoning classification that conditionally allows residential uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this site.

As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this project are accounted for and mitigated in the region's air quality attainment plans. As such, the project would not obstruct implementation of the AQMP and its cumulative impacts on regional air quality would be less than significant. 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 B.3-3
Project Consistency with Air Quality Management Plan's Growth Forecast

Forecast Year	Population in City	Project	Households in City	Project	Employment in City	Project
2020	4,017,400	97	1,441,400	40	1,899,500	8
2040	4,609,400		1,690,300		2,169,100	

¹² Brentwood-Pacific Palisades Community Plan, www.cityplanning.lacity.org/complan/pdf/btwcptxt.pdf.

Source: CAJA 2017, based on SCAG 2016 Regional Transportation Plan Growth Forecast.
 The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates.
 Employment forecast based on SCAG “Employment Density Study”, October 31, 2001 and assumes one employee per 388 square feet (restaurant average) and 369 (retail average) in Los Angeles County.

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 B.3-4**, 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 2016 RTP/SCS and 2016 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 B.3-4
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent. The Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes. The Project would be located in an urban area with public transit options, including Metro Route 534 with service to Santa Monica and Malibu, Route 602 with service to Westwood, and the Santa Monica Big Blue Bus Route 9 on Sunset Boulevard.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Where appropriate, the property management company could encourage telecommuting with future tenants.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Not Applicable. The Project includes future employers that could promote rideshare programs and subsidies.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Not Applicable. The Project includes future employers that could implement parking management programs.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas	Not Applicable. The Project does not include special events that would require traffic management.

Strategy	Project Consistency
and times of high levels of pedestrian activities.	
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would be infill development that would provide local residents with proximate access to more jobs.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. 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 Metro.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes, including proximity to bus routes operating by Metro.
Policy 4.3.1. 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.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.3.2. 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.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Not Applicable. This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.

Strategy	Project Consistency
alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: CAJA Environmental Services, January 2018.	

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

Less Than Significant Impact with Mitigation Incorporated.

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.2 model using assumptions from the Project's developer, including the Project's construction schedule of 15.5 months.

Table B.3-5 summarizes the proposed construction schedule that was modeled for air quality impacts.

**Table B.3-5
Proposed Construction Schedule**

Phase	Duration	Notes
Demolition	2 weeks	Debris from 1,860 square feet of development and 6,000 square feet of asphalt hauled off-site 32 miles to Sylmar
Grading	2 months	20,000 cubic yards of soil export, 10 cy haul truck capacity, 32-mile haul trip
Building Construction	12 months	
Architectural Coatings	3 months	
<p>Dates are non-binding and are conservative assumptions for modeling purposes. The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.</p> <p>CAJA Environmental Services, January 2018.</p>		

Regulations

Construction

SCAQMD Rule 403 addresses fugitive dust emissions of PM₁₀ and PM_{2.5}, 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 3.3-6 assumes the application of BACMs to control fugitive dust.

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.

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

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

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

Operation

Any restaurants that include chain-driven charbroilers shall comply with SCAQMD Rule 1138, which requires use of catalytic oxidizer controls, Rule 1174 that controls VOC emissions from barbecue charcoal, Rule 1153 that addresses commercial bakery ovens, and any other applicable regulations.

Construction

As shown in **Table B.3-6** the construction of the Project will produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

In terms of local air quality, the Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. However, construction activities could produce PM₁₀ and PM_{2.5} emissions

that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the grading phase. As a result, construction impacts on localized air quality are considered significant but mitigable.

Table B.3-6
Estimated Daily Construction Emissions - Unmitigated

Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2019	4	50	24	<1	12	7
2020	4	12	12	<1	1	1
Maximum Regional Total	4	50	24	<1	12	7
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	4	30	19	<1	11	6
Localized Significance Threshold	--	103	562	--	4	3
Exceed Threshold?	N/A	No	No	N/A	Yes	Yes
Dates are non-binding and are conservative assumptions for modeling purposes. The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Source: DKA Planning, 2018 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area.						

Operation

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 514 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.¹³ As shown in **Table B.3-7**, operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5} emissions. 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 NO₂, CO, PM₁₀, and PM_{2.5} from sources on-site. As shown in **Table B.3-7**, 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 B.3-7
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1	<1	4	<1	<1	<1

¹³ Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	4	12	<1	3	1
Net Regional Total	2	5	16	<1	3	1
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	1	<1	4	<1	<1	<1
Localized Significance Threshold	-	103	562	-	1	1
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2018 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area.						

Mitigation Measure

MM-AIR-1 All off-road construction equipment greater than 50 hp shall meet USEPA Tier 4 emission standards to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. 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 CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

Impacts after Mitigation

As shown in **Table B.3-8**, implementation of **Mitigation Measure MM-AIR-1** would substantially reduce on-site PM₁₀ and PM_{2.5} emissions during the construction process, particularly during the grading phase. 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 B.3-8
Estimated Daily Construction Emissions - Mitigated

Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2019	1	22	25	<1	4	2
2020	3	2	12	<1	<1	<1
Maximum Regional Total	3	22	25	<1	4	2
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	3	2	19	<1	3	2
Localized Significance Threshold	--	103	562	--	4	3
Exceed Threshold?	N/A	No	No	N/A	No	No

Dates are non-binding and are conservative assumptions for modeling purposes.

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels.

Source: DKA Planning, 2018 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area.

Cumulative Analysis

Construction

Construction of the Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM₁₀ and PM_{2.5} would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered less than significant.

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. Construction of the Project itself could produce cumulative considerable emissions of localized nonattainment pollutants PM₁₀ and PM_{2.5}, as the anticipated emissions would exceed LST thresholds set by the SCAQMD. This is considered a significant but mitigable impact.

There are two proposed developments within 600 feet of the Project Site that were identified by the project's traffic study that could produce cumulative impacts during the construction project (i.e., 47-unit apartment at 17030 Sunset Boulevard and 82-unit condominium at 17331 Tramonto Drive).¹⁴ If either of these Related Projects were to undertake construction concurrently with the proposed Project, localized CO, PM_{2.5}, PM₁₀, and NO₂ concentrations would be further increased. However, the application of LST thresholds to each related project in the local area would help ensure that each project does not produce localized hotspots of CO, PM_{2.5}, PM₁₀, and NO₂. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM₁₀ and PM_{2.5} that generally double with every doubling of distance.

Mitigation Measure MM-AIR-1 would require the use of cleaner off-road construction equipment. SCAQMD Rule 403 calls for good housekeeping measures that substantially reduce PM₁₀ and PM_{2.5} emissions during on-site construction activities, as well as reducing VOC emissions during the application of architectural coatings. These could similarly be implemented at other construction sites for any Related Projects. Construction of the Project would not have

¹⁴ Overland Consultants, Inc. "Traffic Impact Analysis for 17346 Sunset Mixed-Use Project", April 2018.

any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors with implementation of **Mitigation Measure MM-AIR-1**.

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. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table B.3-7**, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a mixed-use development that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM₁₀ and PM_{2.5} would be minimal. Likewise, existing land uses in the area include 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.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB 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:

- Edgewater Towers condominiums; 17352 Sunset Boulevard; 60 feet east of the Project Site.
- Chabad of Pacific Palisades with Palisades Jewish Early Childhood Center, 17315 Sunset, 360 feet northwest of the Site.
- Multi-family residences, 17311 Castellammare Drive; 370 feet west of the Project Site.
- Westside Waldorf School, 17310 Sunset, 390 feet northeast of the Site.

Construction

As illustrated in **Table B.3-6**, these nearby receptors could be exposed to substantial concentrations of localized pollutants PM₁₀ and PM_{2.5} from construction of the Project. Specifically, construction activities would exceed SCAQMD LST thresholds for PM₁₀ and PM_{2.5} 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-Air-1 would require the use of off-road construction equipment. Further, SCAQMD Rule 403 calls for good housekeeping measures that substantially reduce PM₁₀ and PM_{2.5} 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-Air-1**.

Operation

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area 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. 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.¹⁵ Specifically, traffic levels of service at eight intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2020 horizon scenarios.¹⁶

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 CARB based on chronic exposure to these emissions.¹⁷ 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.¹⁸ The Project 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.

¹⁵ Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

¹⁶ Overland Consultants, Inc. "Traffic Impact Analysis for 17346 Sunset Mixed-Use Project", April 2018.

¹⁷ 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)

¹⁸ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

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

Less Than Significant Impact.

The Project would introduce residential and commercial land 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). The SCAQMD would enforce any regulations relating to restaurants, such as Rule 1174 that controls VOC emissions from barbecue charcoal, Rule 1153 that addresses commercial bakery ovens, Rule 1138 that governs char-broiler emissions from restaurants. SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. As a result, any odor impacts from the Project would be considered less than significant.

IV. Biological Resources

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

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

Less Than Significant Impact.

A 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 Wildlife¹⁹ (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 primarily covered with a building and surface parking. There are no City or County significant ecological areas on the Project Site.²⁰

¹⁹ 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>.

²⁰ Navigate LA, Significant Ecological Areas layer: <http://navigatea.lacity.org/navigatea/>.

The Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) and the CDFW Code Section 3503. Compliance with the regulations of the MBTA and CDFW would ensure impacts are less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game 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.²¹ Therefore, no impact to riparian habitat or sensitive natural community would occur. The nearest riparian resource is a riverine creek that parallels Los Liones Drive, approximately 900 feet north of the Site. The nearest body of water is a freshwater pond (Santa Ynez Lake) that is maintained by the Self-Realization Fellowship at 17190 Sunset, approximately 1,200 feet northeast. Therefore, no impacts would occur.

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

No Impact.

A significant impact would occur if state or federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. The Project Site is located in an urbanized area of the City. No state or 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.²²

Therefore, the Project would not result in the direct removal, filling, or hydrological interruption of a state or federally protected wetland. Therefore, no impacts would occur.

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

No Impact.

A 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 the existing urban

²¹ U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>.

²² U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>.

development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the Project area. Therefore, no impacts would occur.

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

Less Than Significant Impact.

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, which protects certain trees (including Valley Oak and California Live Oak, Southern California Black Walnut, Western Sycamore, and California Bay).²³

No trees subject to the City's Tree Replacement Program will be removed. In addition, there are no protected trees on the Site.²⁴

As shown in **Appendix A-2**, landscaping will be provided around the Site, along the driveways, along the Sunset Boulevard frontage, and on the rooftop. The Project is required to provide 1 24-inch box tree per 4 units (or 10 trees). The Project would provide 15 24-inch box trees. Impacts will be less than significant.

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

No Impact.

A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site. There are no City or county significant ecological areas.²⁵

The Project would 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. Therefore, no impacts would occur.

²³ City of Los Angeles, Ordinance No. 177404: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

²⁴ Landscape Plans, Shadley Design, October 5, 2018.

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

V. Cultural Resources

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

The section is based, in part, on the following item, included as **Appendix C** of this MND:

C Archaeology Response, South Central Coastal Information Center, February 21, 2018.

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

Less Than Significant Impact.

There are no historic buildings on the Project Site.²⁶ Therefore impacts would be less than significant.

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

Less Than Significant Impact.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities. The Project would require excavation for subterranean parking, utility and foundation work, and grading which could create a possibility of encountering an archaeological resource.

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 will 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. Therefore, impacts would be less than significant.

²⁶ <http://navigatela.lacity.org/navigatela/> and <http://historicplacesla.org/map>

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

Less Than Significant Impact.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities. The Project would require excavation for subterranean parking, utility and foundation work, and grading which could result in the potential for human remains to be found within the Project Site.

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, work will stop immediately and the County Coroner will be contacted. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. 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. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Therefore, impacts would be less than significant.

VI. ENERGY

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

The section is based in part on the following item, included as **Appendix F** of this MND:

F Energy and Fuel Calculations, February 2018.

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

Less Than Significant Impact.

Regulatory Framework

Federal Regulations

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.²⁷

State Building Energy Efficiency Standards

The Building Energy Efficiency Standards (Title 24 Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an “energy budget” in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall

²⁷ CAFE standards: www.nhtsa.gov/fuel-economy.

efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Standards that contain data and other information that helps builders comply with the Standards.

The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Standards. The 2016 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.²⁸

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 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

California Renewable Energy Resources Act

LADWP is subject to the California Renewable Energy Resources act and thus is required to commit to the use of renewable energy sources, 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 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;

²⁸ CalGreen: <http://www.bsc.ca.gov/>

multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and “other renewables that may be defined later”.²⁹

LADWP’s target procurement of energy from renewable resources by 2020 is 33 percent. As of 2017, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 30 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. 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.

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 LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation.

Assembly Bill 32

Assembly Bill 32 (Health and Safety Code Sections 38500–38599; AB 32), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the California Public Utilities Commission and the California Energy Commission with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.

Assembly Bill 1493 (AB 1493)/Pavley Regulations

AB 1493 (commonly referred to as CARB’s Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations are expected to reduce GHG

²⁹ City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

emissions from California’s passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs.³⁰

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.³¹

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a “sustainable communities strategy” (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.³²

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). SCAG’s first-ever SCS is included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. Recently, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS).³³ The goals and policies of the Updated RTP/SCS are the same as those in the 2012–2035 RTP/SCS.

The RTP/SCS also establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT.

³⁰ Clean Car Standards—Pavley, Assembly Bill 1943, www.energy.ca.gov/low_carbon_fuel_standard/

³¹ Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/

³² Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm

³³ SCAG, 2016 RTP/SCS, dated April 2016.

The Project Site is not located within a HQTAs as designated by 2016 RTP/SCS.³⁴

Senate Bill 1389

Senate Bill 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The California Energy Commission must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2015 Integrated Energy Policy Report, addresses a variety of issues related to energy efficiency, benchmarking under the Assembly Bill 758 Action Plan, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, achieving 50 percent renewable by 2030, among other issues.³⁵

2017 Power Strategic Long-Term Resource Plan³⁶

The LADWP released the 2017 Power Strategic Long-Term Resource Plan (SLTRP) in December 2017, which provides a 20-year framework to ensure LADWP can meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The SLTRP is an update of the 2016 Integrated Resources Plan (IRP), and reflects evolving environmental, regulatory, and economic developments. The 2016 IRP included a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; development of 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.

The 2017 SLTRP 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 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 10mw, 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. This SLTRP 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

³⁴ http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf

³⁵ California Energy Commission, 2015 Integrated Energy Policy Report.

³⁶ 2017 SLTRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afLoop=86387266209556, accessed March 6, 2019.

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.³⁷

LADWP Rules Governing Water and Electric Service

Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.³⁸ LADWP will provide a dependable supply of potable water, from available sources, in quantities adequate to meet the reasonable needs of its customers. The delivery of such supply will be at the Service Connection. Generally, the LADWP will maintain operating pressures at the Service Connection of not less than 25 pounds per square inch. Pressures may be lower at times of Maximum Demand or because of unusual elevations or other special conditions.

City of Los Angeles Green Building Code

The 2017 LA Green Building Code is based on the 2016 California Green Building Standards Code and commonly known as CALGreen as discussed above, that was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

Specific measures to be incorporated into the Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete
- sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;

³⁷ 2016 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afLoop=86387266209556, accessed March 6, 2019.

³⁸ LADWP Rules Governing Water and Electric Service: <https://www.lacity.org/your-government/government-information/city-charter-rules-and-codes>

- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15% of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems; and
- Provision of electric vehicle charging stations in the parking structure; 5% of total spaces will be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Los Angeles Department of Water and Power

The LADWP provides electricity to the Project Site. The LADWP provides its 1.4 million customers with more than 26 million megawatt hours (mw-h) of electricity a year.³⁹ 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 and plans to acquire additional facilities as their load increases. The LADWP electricity portfolio is made up of coal (39 percent), natural gas (22 percent), renewables⁴⁰ (20 percent), nuclear (11 percent), unspecified sources (5 percent), and large hydroelectric (3 percent).⁴¹

Table B.6-1, LADWP Electricity Capacity, shows the LADWP electricity system capacity.

Table B.6-2, LADWP Energy Usage, shows the LADWP power usage.

Table B.6-3, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

³⁹ LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afLoop=81976737428000, June 10, 2017.

⁴⁰ Renewables include small hydroelectric, solar, wind, geothermal, biomass and waste.

⁴¹ 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_afWindowId%3Dna2o8wvza_33, June 10, 2017.

Table B.6-1
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177
Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afLoop=1119458526572567 Table: CAJA Environmental Services, January 2018.	

Table B.6-2
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	23.14
Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afLoop=1119458526572567 . Table: CAJA Environmental Services, January 2018.	

Table B.6-3
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2019-20	8,008	12,179	1,799	268	265	22,520	5,866
2020-21	8,013	12,059	1,806	269	345	22,492	5,872
2021-22	8,046	12,056	1,813	270	428	22,613	5,889
2022-23	8,088	12,118	1,818	271	508	22,802	5,993
2023-24	8,140	12,215	1,820	271	587	23,033	5,976
2024-25	8,201	12,339	1,823	272	650	23,286	6,029
2025-26	8,258	12,462	1,828	273	716	23,537	6,076
2026-27	8,327	12,602	1,833	273	771	23,807	6,129
2027-28	8,399	12,742	1,838	274	826	24,078	6,182
2028-29	8,472	12,881	1,842	275	872	24,341	6,239

gw-h – gigawatt-hours; mw – megawatts
 Misc. includes streetlighting, Owens Valley, and intra-departmental
 LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afLoop=692892870477547&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D692892870477547%26_afWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4
 Table: CAJA Environmental Services April 2018.

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. The 2013 California Energy Commission's forecasted load factors shows that forecasted load factor will continue to decline for earlier years of the forecast, due to energy conservation; however, forecasted load factors increase in later years due to increasing electric vehicle usage.⁴²

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.⁴³

⁴² LADWP, 2016 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afLoop=86387266209556, June 10, 2017.

⁴³ Madison Gas and Electric, Glossary for Load Factor: <http://www.mge.com/about/electric/glossary.htm#f>, June 10, 2017.

- 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 $[(10,000 \text{ kw-h} / 720 \text{ hours} / 21 \text{ kw}) * 100]$.

Natural Gas Supply and Demand

The 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 southern California, including the Project Site. SCG owns and operates 95,000 miles of gas distribution mains and service lines, gas transmission compressor stations, underground storage facilities, as well as nearly 3,000 miles of transmission and storage pipeline. 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.⁴⁴ 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 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 2018 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 0.74% from 2018 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 2018 to 2035, residential demand is expected to decline from 236 Bcf to 186 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to decline from 117 Bcf in 2018 to 112 Bcf by 2035. The change reflects an annual decline rate of 0.7% over the forecast period. The noncore, non-EG markets are expected to decline from 177 Bcf in 2018 to 156 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

⁴⁴ 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

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.⁴⁵

In 2018 gas demand for California is projected to average 5,871 million cubic feet per day (cf/day) and is projected to decrease to 5,381 million cf/day by 2035, a decline of 0.5 percent per year.⁴⁶ **Table B.6-4, Statewide Total Supplies and Requirements**, shows the anticipated statewide total supplies and requirements for natural gas for 2018 to 2022. In 2017 (the latest data available from the 2018 California Gas Report), SCG's highest winter sendout was 3,456 million cf/day and highest summer sendout was 3,481 million cf/day.⁴⁷

Table B.6-4
Statewide Total Supplies and Requirements

	2018	2019	2020	2022	2025
Utility Supply Source					
California Sources	87	87	87	87	87
Out-of-State	4,886	4,731	4,654	4,634	4,622
Non-Utility Served Load	1,131	1,093	1,056	1,054	1,028
Statewide Supply Source Total	6,104	5,910	5,797	5,775	5,738
Utility Requirements					
Residential	1,160	1,146	1,128	1,115	1,098
Commercial	495	492	488	485	479
Natural Gas Vehicles	50	53	56	59	62
Industrial	1,014	1,018	1,009	1,017	1,028
Electric Generation	1,651	1,505	1,458	1,444	1,441
Enhanced Oil Recovery Steaming	46	46	45	46	46
Wholesale/International Exchange	249	251	251	252	251
Company Use and Unaccounted-For	75	73	71	71	72
Non-Utility Served Load	1,131	1,093	1,056	1,054	1,028
Statewide Requirements Total	5,871	5,677	5,564	5,542	5,505
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. 2018 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf Table: CAJA Environmental Services, March 2019.					

The SCG demands for 2015 and 2035 are shown in **Table B.6-5**. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals,

⁴⁵ 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

⁴⁶ 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

⁴⁷ 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

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.⁴⁸

Table B.6-5
SCG Natural Gas Demands

	2015	2035	Difference
Residential	236	186	-50
Core Commercial	117	112	-5
Non-Core Commercial	177	156	-21
All measurements in billion cf 2018 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf . Table: CAJA Environmental Services, March 2019.			

Methodology

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod. Energy impacts associated with transportation during operation were also assessed. The 2016 Title 24 standards, which went into effect on January 1, 2017 are 28 percent more efficient than the 2013 Title 24 standards for residential construction and five percent more efficient for non-residential construction and are included in CalEEMod version 2016.3.2.

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 LADPW, the 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".⁴⁹ 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

⁴⁸ 2018 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, March 1, 2019.

⁴⁹ City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

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 2020.⁵⁰ As of 2017, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 30 percent of its overall energy mix.

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 [N]. 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) shall comply with the following:

1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
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 [N]. 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

⁵⁰ https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afLoop=482029044070877.

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.⁵¹ 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.⁵² 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.

Project Impacts

Construction

Electricity

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). These tools and lighting would be powered with charging stations supplied by portable generators. There would be no use of any permanent infrastructure for the delivery of electricity until after construction of the buildings. The electrical demand generated by these tools⁵³ and lighting⁵⁴ is substantially less than the operational demand. Electrical consumption of small power construction tools ranges from 300 to 6,000 watts during run time (0.3 kw to 6 kw). A typical temporary construction lighting tower would have 4 x 1,000-watt fixtures (4 kw). If running for 8 hours per evening/night, the usage would be 32 kw-h. Electricity, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections.

This would be consistent with best management practices 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 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

⁵¹ California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.

⁵² California Energy Commission, California Solar Resources, April 2005, <http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF>.

⁵³ uspowerco.com/articles/power_consumption_chart_for_toolsUU

⁵⁴ sunbeltrentals.com/equipment/category.aspx?id=19UU

necessary for general construction and renovation activity would generally not result in substantial increase in on-site electricity use over existing conditions.

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site.

As shown in **Table B.6-5**, a total of approximately 199.8 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated construction electricity usage represents approximately 0.15 percent of the estimated net annual operational demand⁵⁵ which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Therefore, electricity impacts during construction would be less than significant.

Table B.6-5
Electricity Usage During Construction

Fuel Type	Quantity
Water Consumption	199.8 kWh
Lighting, equipment and other construction activities needing power	N/A ¹
Water application rate= 3020 gal/acre/day kWhr equivalent= 0.01 kWhr 1) Gallons per year of water usage for dust control is calculated based on a minimum control efficiency of 66% (three times daily) with an application rate of 3,020 gal/acre/day (Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition)) and average of 25 construction days per month. 2) CalEEMod Default: Each gallon of delivered potable water in Southern California is associated with 0.009727 kWhr of electricity). Water Usage for fugitive dust control during construction: Water application rate = 3,020 gallons/acre/day. Grading 20 days x 0.34 acres x 3,020 gallons = 20,536 gallons x 0.009727 = 199.8 kWhr ¹ Electricity usage associated with this line item is not easily quantifiable. Such electricity demand would be temporary, limited, and would cease upon the completion of construction.	

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction.

⁵⁵ 199.8 / 1,464,458 x 100%

Transportation Energy

The petroleum-based fuel use summary provided in **Table B.6-6** represents the amount of transportation energy that could potentially be consumed during Project construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2015 annual on-road gasoline-related energy consumption and 0.01 percent of the 2015 annual diesel fuel-related energy consumption in Los Angeles County. Therefore, transportation impacts during construction would be less than significant.

Table B.6-6
Petroleum Usage During Construction

Fuel Type	Quantity
Gasoline	
On-Road Construction	18,642 gallons
Off-Road Construction	0
Total Gasoline	18,642 gallons
Diesel	
On-Road Construction	13,936 gallons
Off-Road Construction	9,157 gallons
Total Diesel	23,093 gallons
Detailed calculations in appendix to this document.	

Operation

Electricity Demand

As shown in **Table B.6-7, Proposed Electricity Consumption**, 394,312 kw-h/yr (or 394 mw-h/yr) of electricity is proposed to be consumed at the Project Site. No credit is taken for existing uses. This is a worse-case, conservative approach.

Table B.6-7
Proposed Electricity Consumption

Land Use	Total (kw-h/yr)
Residential	174,244
Parking	133,608
Restaurant	66,210
Retail	20,250
Total Proposed	394,312
sf =square feet; kw-h = kilowatt-hour; yr = year For conservative purposes, the CalEEMod model analyzed 44 units. The Project is expected be all retail, but retail and restaurant split was used to provide a conservative analysis since restaurant rates are higher. Electricity use is estimated from CalEEMod 2016.3.2 model sheets, included as appendix. Table: CAJA Environmental Services, February 2018.	

Currently, the LADWP is able to supply over 7,640 mw of generation capacity with the highest recorded peak being 6,396 mw.⁵⁶ If the Project demand of 394 mw-h/year in energy were operating at full load for a full year (8,760 hours), the Project's demand would be approximately 0.05 mw of power.⁵⁷ This represents approximately 0.001 percent of the LADWP's power capacity at existing levels.⁵⁸ Peak demand is expected to grow to 5,872 mw in 2020-2021 (project buildout).⁵⁹ Despite these growth projections, demand would still not exceed the existing capacity of 7,640 mw. Thus, there is adequate generation supply capacity to serve the Project.

Overall, the Project is within the anticipated demand of the LADWP system. The LADWP is forecasted 2021 total energy sales is 22,492 gWh. As such, the Project-related net increase in annual electricity consumption would represent approximately 0.002 percent of LADWP's projected sales in 2021.⁶⁰

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. This analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that in 2020-21, the total adjusted electricity sales (load forecast) will be 23,163 gigawatt-hours (gw-h) with residential uses consisting 8,166 gw-h and commercial uses consisting of 12,506 gw-h. The peak demand would be 5,872 megawatts (mw) in 2020-21.⁶¹

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.⁶² 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 B.6-8, Project Estimated Natural Gas Demand**, the Project is estimated to demand approximately a net increase of 2,066 cubic feet (cf)/year (5.66 cf/day) of natural gas. This total represents a more conservative result since it does not take any credit for the

⁵⁶ LADWP https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afLoop=86275907941327, accessed May 12, 2017.

⁵⁷ $394 / 8,760 = 0.05$

⁵⁸ $0.05 / 5,872 \times 100 = 0.001$

⁵⁹ LADWP, 2017 SLTRP, Appendix A.

⁶⁰ $394 \text{ mw} = 0.394 \text{ gw}$. $0.394 / 22,492 \times 100 = 0.002$.

⁶¹ LADWP, 2017 SLTRP, Appendix A.

⁶² 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).

proposed sustainable and energy conservation features of the Project. No credit is taken for existing uses. This is a worse-case, conservative approach.

**Table B.6-8
Proposed Natural Gas Consumption**

Land Use	Total (kBtu/yr)
Residential	1,111
Parking	0
Restaurant	948
Retail	7
Total Proposed	2,066
sf =square feet; kbtu = ; yr = year; 1 cubic feet = 1 kBtu For conservative purpose, the CalEEMod model analyzed 44 units. The Project is expected be all retail, but retail and restaurant split was used to provide a conservative analysis since restaurant rates are higher. Natural gas use is estimated from CalEEMod 2016.3.2 model sheets, included as appendix. Table: CAJA Environmental Services, February 2018.	

The 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 2017 is estimated at 2,944 million cf/day and by 2022 is estimated at 2,849 million cf/day. The Project's natural gas demand represents approximately 0.002 percent of the 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., distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure would occur.

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 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.

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.

Therefore, because of energy efficient design, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Project Site, Project impacts related to natural gas would be less than significant.

Transportation Energy Demand

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. Two Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. The intersection of Sunset Boulevard and Pacific Coast Highway provides stops for LA Metro Bus Route 534. Immediately adjacent to the Site is a stop for LA Metro Bus Route 602. 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 Sites 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 of approximately 1,351,946 miles per year⁶³, and assuming the Project's mix of vehicle types (automobiles,

⁶³ Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix.

trucks, and motorcycles) have an average fuel economy of 22.711 mpgs⁶⁴, approximately 50,624 gallons of gas and approximately 35,4515 gallons of diesel would be required in a year. For comparison purposes, the fuel usage would represent approximately 0.001 percent of the 2015 annual on-road gasoline-related energy consumption and 0.01 percent of the 2015 annual diesel fuel-related energy consumption in Los Angeles County. 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.

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

Less Than Significant Impact.

The Project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would incorporate a variety of water conservation features required by the LAMC that would also promote energy conservation.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SCG, respectively. Use of petroleum-based fuels during construction and operation would also be minimized.

Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

⁶⁴ 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>.

VII. Geology and Soils

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS					
Would the project:					
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 direct or indirect risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<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 waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based, in part, on the following items, included as **Appendix E** of this MND:

E-1 Report of Geotechnical Investigation, AES, January 24, 2017.

E-2 Geology and Soils Report Approval Letter, LADBS, April 19, 2018.

E-3 Paleontology Response, Los Angeles Natural History Museum, February 1, 2018.

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must

be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

- a) **Directly or indirectly cause people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

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. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

The Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone.^{65, 66} The Site is not within an earthquake fault zone.⁶⁷

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. 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 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.

The Project would comply with Site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts would be less than significant.

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

⁶⁵ ZIMAS search: <http://zimas.lacity.org/>.

⁶⁶ <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁶⁷ http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/TOPANGA_EZRIM.pdf

Less Than Significant Impact.

The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various “seismic hazards zones.” The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act requires a site investigation by a certified engineering geologist and/or civil engineer with expertise in geotechnical engineering, for projects sited within a hazard zone. The investigation is to include recommendations for a “minimum level of mitigation” that should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. 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 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.

The Project would comply with Site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the City of Los Angeles ZIMAS mapping system the Project Site is classified within

an area susceptible to liquefaction.⁶⁸ According to the General Plan Safety Element, the Project Site is not within a liquefaction area, which lies south of PCH.⁶⁹

Based on the Geotechnical Investigation analysis, soil liquefaction will not occur at the Project Site.⁷⁰ The Project shall comply with the Uniform Building Code Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Therefore, impacts would be less than significant.

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

Less Than Significant 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 City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.⁷¹ The General Plan Safety Element does identify areas around the Project Site as a bedrock landslide area.⁷²

Based on the Geotechnical Investigation analysis, the Site is considered feasible for the Project.⁷³ Therefore, impacts would be less than significant.

b) 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 buildings) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur.

Grading and excavation would be required for the parking levels, foundation footings, and soil compaction. All grading activities would require permits from the City of Los Angeles Department of Building and Safety, which reviews compliance with requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The Project's grading plan would conform with the

⁶⁸ ZIMAS search: <http://zimas.lacity.org/>.

⁶⁹ Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

⁷⁰ Report of Geotechnical Investigation, AES, January 24, 2017.

⁷¹ ZIMAS search: <http://zimas.lacity.org/>.

⁷² Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

⁷³ Report of Geotechnical Investigation, AES, January 24, 2017.

City's Landform Grading Manual guidelines, subject to approval by the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices per LAMC Section 91.7013 would be provided to the satisfaction of the Los Angeles Department of Building and Safety.

During construction, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). With the implementation of the required construction BMPs, soil erosion during construction impacts would 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 developed; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, impacts would be less than significant.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

Less Than Significant Impact.

A significant impact may occur if a 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. As discussed in the response to Questions 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for liquefaction or landslides.

The Project is considered feasible from a geotechnical engineering standpoint. The Project would comply with the recommendations and conditions in the Geotechnical Investigation and LADBS Approval Letter. This would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts would be less than significant.

- d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

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 contain significant amounts of clay, which may expand or shrink with moisture variations.

The fine-grained bedrock at the base of the proposed building is considered to be potentially expansive. However, the Project is considered feasible from a geotechnical engineering standpoint. The Project would comply with the recommendations and conditions in the

Geotechnical Investigation and LADBS Approval Letter. This would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts would be less than significant.

Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, LAMC, and other applicable building codes which includes building foundation requirements appropriate to Site-specific conditions. Therefore, impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact.

The Project Site is located in an urbanized area within the City of Los Angeles, which is 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 impact would occur.

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

Less Than Significant Impact.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities. The Project would require excavation for subterranean parking, utility and foundation work, and grading which could result in the potential for buried paleontological resources to be found within the Project Site.

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 will 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. Therefore, impacts would be less than significant.

VIII. Greenhouse Gas Emissions

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

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

B Air Quality and Greenhouse Gases Appendices, DKA Planning, February 2018.

a) 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 net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world. Climate change analyses are also unique because emitting CO₂ into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO₂ 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 CO₂ 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 (CO₂) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO₂ emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO₂ comprises over 80 percent of GHG emissions in California.⁷⁴
- Methane (CH₄) 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. Mobile sources represent 0.5 percent of overall methane emissions.⁷⁵
- Nitrous Oxide (N₂O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N₂O emissions.⁷⁶ N₂O 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 (SF₆) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF₆ 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.⁷⁷

As shown in **Table B.8-1**, the other GHGs are less abundant but have higher GWP than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. 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 CO₂ were being emitted. High GWP gases such as HFCs, PFCs, and SF₆ are the most heat-absorbent.

⁷⁴ California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.

⁷⁵ United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).

⁷⁶ United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N₂O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001.

⁷⁷ California Air Resources Board, Climate Change Emission Control Regulations, 2004.

Table B.8-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	28
Nitrous Oxide (N ₂ O)	265
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbons (HFCs)	124-14,800
Sulfur Hexafluoride (SF ₆)	22,800
Source: SCAG, Draft Program EIR for 2016 RTP/SCS. November 24, 2015. Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.	

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 21st 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. The Strategy's key adaptation recommendations included:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;

- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State fire-fighting agencies.

In 2014, the State's "Safeguarding California Plan" added new recommendations and updated portions of the 2009 Plan to reflect new circumstances. In 2016, the State approved its Safeguarding California Implementation Action Plans, which included high-level vulnerability assessments and a new Land Use and Community Development sector. In May 2017, the State released its draft "Safeguarding California Plan: 2017 Update" which includes the following highlights:

- Update of comprehensive statewide adaptation strategies and implementation actions
- New framework to better integrate sectors and link ongoing research to state plan
- Update recommendations for all ten sectors
- Outline annual reporting structure for next steps and adaption actions
- Increase focus on vulnerable populations, environmental justice concerns, and equity
- Propose conceptual metrics to track and measures climate impacts and adaptation responses of state government over time

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 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 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 195 countries participated and published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to three 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 opened for signature on April 22, 2016. However, in May 2017, President Donald Trump announced that the U.S. would withdraw from the agreement.

The Western Regional Climate Action Initiative (WCI). The 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 is also intended to link California and the other member states and provinces.

Federal

U.S. Environmental Protection Agency (USEPA). The USEPA 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.⁷⁸ 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, investments in renewable energy sources, 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. However, in March 2017, President Trump signed an executive order that rescinded the 2013 Plan.

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.

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 former 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 (the Pavley regulation).

⁷⁸ Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])

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.⁷⁹ 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.⁸⁰ 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 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.⁸¹

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

⁷⁹ California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

⁸⁰ California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

⁸¹ Greenblatt, Jeffrey, Energy Policy, “Modeling California Impacts on Greenhouse Gas Emissions” (Vol. 78, pp. 158-172).

maintenance, and increasing methane capture from landfills.⁸² 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 CO₂ per year and make up 94 percent of the point source CO₂ 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.

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. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

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).⁸³ 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,

⁸² CARB, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

⁸³ CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.

building energy efficiency standards, and renewable energy.⁸⁴ 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) MMTCO₂e 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 MMTCO₂e. 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 MMTCO₂e 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 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.^{85, 86}

In December 2017, CARB adopted a second update to the Scoping Plan to reflect the 2030 targets set by Executive Order B-30-15 and codified by SB 32. This update calls for strategies that cap the State's GHG emissions at 260 MMTCO₂e by 2030, which would represent a 40 percent reduction from 1990 levels. This includes several key elements, including:

- Relying on California's previously-codified statutory commitment to generate at least half of its electricity from renewable resources by 2030;
- Making more stringent CARB's pioneering Low Carbon Fuel Standard;
- Depending on the California Energy Commission to strengthen dramatically the state's already-stringent building and appliance efficiency standards;
- Enforcing strong new rules to reduce state methane and other short-lived climate pollutants that are especially pernicious;
- Supporting and preserving California's natural and working landscapes in order to enhance carbon sequestration; and
- Devising transformative changes to California's public and private transportation sectors, including a ramped-up conversion of private vehicles from carbon-based to alternative fuels, increased public transit opportunities and progressive land use policies that allow

⁸⁴ CARB, Greenhouse Gas Inventory – 2020 Emissions Forecast, <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>. Accessed June 2014.

⁸⁵ 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."].

⁸⁶ CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

Californians to live closer to their workplaces, thus reducing individual and statewide vehicle miles traveled.

- Continuing the State’s cap-and-trade program.

As shown in **Table B.8-2**, 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 B.8-2
Emission Reductions Needed To Meet AB 32 Objectives In 2030

Sector	Million Metric Tons of CO ₂ e Reduction	Percent of Statewide CO ₂ e Inventory	Summary of Recommended Actions
Electric Power	108	-8	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	152	-32	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
Industrial	98	-15	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	7	-29	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Source: California EPA, “California’s 2017 Climate Change Scoping Plan”, Nov. 2017			

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 CO₂e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO₂e 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.

On July 25, 2017, Governor Brown signed AB 398, which extends the program through 2030. AB 398 calls for half of emissions offsets to be generated in California and prohibits CARB and air districts from regulating CO₂ from sources under the Cap-and-Trade program.

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
- 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.⁸⁷

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 CO₂e 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

⁸⁷ American Planning Association, California Chapter, Analysis of SB 375, <http://www.calapa.org/-en/cms/?2841>.

manufacturing plants, or uses that utilize combustion engines.⁸⁸ 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 2035.⁸⁹ For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—ARB adopted Regional Targets for reduction of GHG 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.⁹⁰

In October 2017, ARB released its final report recommending updates to the SB 375 GHG emission reduction targets across the State.⁹¹ This addresses several statutory, technological, and policy factors that have changed since the original 2010 targets. The proposed 2020 targets for the SCAG region remain at eight percent reductions, while the proposed 2035 target could increase from a 13 percent to a 21 percent reduction.

Senate Bill 32. On September 7, 2016, Governor Brown signed into law a measure that extends AB 32 another ten years to 2030 and increases the State's objectives. SB 32 calls on Statewide reductions in GHG 40 percent below 1990 levels by 2030. Further regulatory actions by the State are forthcoming that will further challenge communities to reduce GHG emissions in the future.

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

⁸⁸ California Air Resources Board. <http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>.

⁸⁹ CARB. 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>.

⁹⁰ 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.

⁹¹ https://www.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf accessed December 4, 2017.

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 2016 CALGreen Code became effective January 1, 2017.

Regional

SCAQMD Recommendations for Significance Thresholds. The 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 CO₂ equivalent (MTCO₂e) 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 MTCO₂e for residential projects, 1,400 MTCO₂e for commercial projects, and 3,000 MTCO₂e for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 MTCO₂e per service population as a 2020 target and 3.0 MTCO₂e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO₂e and the plan-level target for 2035 was 4.1 MTCO₂e. The SCAQMD has not established a timeline for formal consideration of these thresholds.⁹² 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. SCAG's RTP/SCS calls for concentrating future development and providing higher intensity development in proximity to transit hubs in order to reduce vehicle miles traveled and GHG emissions from personal vehicles. It is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations...to be consistent with the regional transportation plan or an alternative planning strategy."⁹³ The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development and transportation.⁹⁴ It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation

⁹² SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs.scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.

⁹³ California Gov't. Code §65080(b)(2)(E).

⁹⁴ SCAG, Final PEIR, 2012-2035 RTP/SCS, Appendix G: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

measures are particularly important where streamlining mechanisms under SB 375 are utilized. On April 7, 2016, SCAG adopted its 2016-2040 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 measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.⁹⁵ These 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. 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

⁹⁵ SCAG, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8.

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.⁹⁶ Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.⁹⁷ The City's ordinance affects the following types of development:⁹⁸

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:

⁹⁶ City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).

⁹⁷ U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396>.

⁹⁸ Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

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:

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 a commercial fast food restaurant and drive through that have not been operational for over two years. As such, this analysis assumes there are no anthropogenic emissions of GHG.

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.⁹⁹ 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 develop a standardized approach to the voluntary reporting of GHG emissions."¹⁰⁰ 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).

⁹⁹ 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, accessed August 1, 2016.

¹⁰⁰ Ibid.

- 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).¹⁰¹

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.

CARB 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 CARB to be considered for future strategies.¹⁰² For example, CARB 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.”¹⁰³ Therefore, direct and indirect emissions have been calculated for the Project.

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.¹⁰⁴

Significance Criteria

CARB, 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.¹⁰⁵ As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR’s amendments to the

¹⁰¹ 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.

¹⁰² 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 August 1, 2016.

¹⁰³ OPR Technical Advisory, p. 5.

¹⁰⁴ See www.caleemod.com.

¹⁰⁵ The SCAQMD 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.

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:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.¹⁰⁶

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:

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

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.

¹⁰⁶ A recent opinion by the California Supreme Court on November 30, 2015 (Center for Biological Diversity v. California Department of Fish and Wildlife) has suggested that environmental analyses need to support its assumptions and provide evidentiary support to find consistency with a “Business as Usual” approach with the AB 32 Scoping Plan.

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.¹⁰⁷ 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.”¹⁰⁸ 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 compiles with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.¹⁰⁹

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.¹¹⁰

To evaluate a project’s potential greenhouse gas emissions under CEQA, a lead agency may adopt a significance criterion of whether the project will be consistent with statewide greenhouse gas emission reduction goals, as set forth in the California Global Warming Solutions Act of 2006 (or “AB 32”) and the California Air Resources Board 2008 Climate Change Scoping Plan (“Scoping Plan”) that implements A.B. 32. (*Center for Biological Diversity v. Cal. Dept. of Fish and Game* (2015) 62 Cal.4th 204, 220; see also CEQA Guidelines § 15064.4.)

The statewide greenhouse gas reduction goals include cutting greenhouse gas emissions by approximately 30 percent from the BAU emission levels projected for 2020. The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the forecast was made. A lead agency may use the BAU projection as the baseline to compare a project’s expected greenhouse gas emissions rather than using a baseline of emissions in the existing physical environment. However, the lead agency must provide substantial evidence to show that a project’s specific *project-level* reduction in greenhouse gas emissions as compared to the BAU projection will actually meet the *statewide* goals of greenhouse gas reductions.

¹⁰⁷ Id.

¹⁰⁸ Id. (emphasis added).

¹⁰⁹ See San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to CARB’s GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), where the SJVAPCD “determined that GHG emissions increases that are covered under CARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Further, SCAQMD has taken this position as a lead agency, preparing three Negative Declarations and one Draft EIR that applied its 10,000 MTCO₂e/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 #2012041014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2) (October 2014); 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); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2) (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2) (April 2014).

¹¹⁰ 14 CCR § 15064(h)(3).

There are three ways a lead agency could make that showing. First, a lead agency may evaluate the data behind the Scoping Plan's BAU model to determine how a specific project in a proposed location would contribute to the statewide greenhouse gas reduction goals. Second, a lead agency may assess a project's consistency with AB 32's goals in whole or in part by considering a project's compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, such as building efficiency and conservation standards. Third, a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions reductions.

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;
- AB 32 Scoping Plan;
- SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

The following section provides an extensive analysis of the Project's consistency with these State, regional, and local climate action-related policies. This section focuses on disclosing potential GHG emissions.

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 15.5-month duration of construction activities. As shown in **Table B.8-3**, construction emissions of CO₂ would peak in 2019, when up to 9,521 pounds of CO₂e per day are anticipated following implementation of recommended **Mitigation Measure MM-AIR-1**. 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.¹¹¹

¹¹¹ SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, 2008. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2)

Table B.8-3
Estimated Construction Emissions – Mitigated

Construction Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
2019	9,489	1	0	9,521
2020	2,222	<1	0	2,232
Pounds per day Source: DKA Planning, 2018 based on CalEEMod 2016.3.2. Data in Appendix to this MND.				

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 is consistent with the concepts used in CARB'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 CARB 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 B.8-4**, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 948 and 1,397 MTCO₂e per year, respectively, which shows the Project will reduce emissions by 32 percent from CARB's 2020 NAT scenario. 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 B.8-4
Estimated Annual CO₂e Greenhouse Gas Emissions

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	1	1	-	0%
Energy Sources	449	261	-189	-42%
Mobile Sources	872	612	-260	-30%
Waste Sources	20	20	-	0%
Water Sources	41	41	-	0%
Construction	14	14	-	0%
Total Emissions	1,397	948	-448	-32%
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, 2018.				

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the 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 Proposed Project would contribute to statewide

GHG reduction goals. Specifically, the Proposed 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 attract existing trips on the street network that would divert to the proposed uses as "pass-by" trips.

As shown in **Table B.8-5**, 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 0-10 percent in reductions from pass-by trips and up to 5 percent reductions from residents within the proposed development. These would result in concomitant reductions in CO₂e 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 Proposed Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

Table B.8-5
Estimated Annual CO₂e Greenhouse Gas Emissions

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Apartments	0%	0%	0%
Restaurant	5%	10%	0%
Retail	5%	10%	0%
Source: Overland Traffic Consultants, Inc. "Traffic Impact Study for 17346 Sunset Mixed-Use Project," April 2018			

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 CALGreen building codes.
- **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 CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O 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 complies with numerous regulatory measures that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. 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.

b) Conflict with an applicable plan, policy or regulation 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 relevant plans and policies that govern climate change:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG’s Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

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.

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 CARB 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 CARB 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 CARB’s First Update to the AB 32 Scoping Plan.^{112, 113}

¹¹² 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.”]

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 B.8-6 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.¹¹⁴ Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.¹¹⁵
- **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.¹¹⁶
- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.¹¹⁷
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.¹¹⁸

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.

Table B.8-6
Project Consistency with AB 32 Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	Not Applicable. The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. 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	Not Applicable. The development of standards is not relevant to the Project.

¹¹³ CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

¹¹⁴ CARB, First Update, pp. 37-39, 85, May 2014.

¹¹⁵ CARB, First Update, pp. 40-41, May 2014.

¹¹⁶ CARB, First Update, pp. 55-56, May 2014.

¹¹⁷ CARB, First Update, p. 65, May 2014.

¹¹⁸ CARB, First Update, p. 69, May 2014.

Table B.8-6
Project Consistency with AB 32 Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
change goals.	
Energy Efficiency. 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.	Consistent. The Project will 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.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. 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. LADWP had an average of 23% renewables as of 2013.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	Not Applicable. The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	Not Applicable. The development of regional planning goals is not relevant to the Project. The Project's infill location near several bus routes make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS).
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. This is a state-wide goal and that the Project, whether it does or does not do solar roofs will not affect the state-wide implementation of this program.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Industrial Emissions. 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.	Not Applicable. This measure addresses industrial facilities. The Project is not an industrial facility.
High Speed Rail. Support implementation of a high speed rail system.	Not Applicable. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. 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.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at	Consistent. Under City of Los Angeles

Table B.8-6
Project Consistency with AB 32 Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	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.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project will be compliant with the City's Green Building Ordinance and will incorporate water saving features and energy efficient fixtures into its design.
Agriculture. 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.	Not Applicable. The Project does not include agricultural facilities.
Source: CAJA Environmental Services, 2018.	

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. While the Project itself is not in a High Quality Transit Area (HQTa), it is linked via public transit to Brentwood, which is. 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 will support the penetration of electric zero-emission vehicles into the vehicle fleet.

Table B.8-7 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 B.8-7
Project Consistency With SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis ^a
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local Jurisdictions	Consistent. The Project would include residences for a range of income levels including for very low income level households increasing the supply of housing, including affordable housing, in metropolitan Los Angeles County
Focus new growth around transit.	Local Jurisdictions	Consistent. 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	Consistent. 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	Consistent. The Project would help further jobs/housing balance objectives. The Project is also 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	Not Applicable. 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.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	Consistent. The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. 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	Consistent. 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	Not Applicable. 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.

**Table B.8-7
Project Consistency With SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis ^a
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	Not Applicable. 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.
<i>Technological Innovation and 21st Century Transportation</i>		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	Consistent. 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	Consistent. 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	Not Applicable. While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
Source: SCAG; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

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.

Consistency with the City of Los Angeles ClimateLA Plan

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, 2017, comply with the Los Angeles Green Building Code as amended to comply with the 2017 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 or equivalent. Projects that are LEED certified or the equivalent generally exceed Title 24 (2013) standards by at least 10 percent.¹¹⁹ As such, the Project would incorporate several design elements and programs that will reduce its carbon footprint, including:

1. GHG Emissions Associated with Planning and Design. The Project will implement 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, (Metro). The Project Site's proximity to medium-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 will meet Title 24 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This would include:

- 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.

¹¹⁹ U.S. Green Building Council. "Interpretation 10396" <http://www.usgbc.org/leed-interpretations?keys=10396>

- 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 will be adequately sized by the designer but shall not be less than one inch. The conduit will be labeled as per the Los Angeles Fire Department requirements. The electrical panel will 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 will be suitable for installing future solar panels as determined by the designer.
- Appliances will meet Energy Star designations as 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 will 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. 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 will meet the 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.

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, CARB 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, would be covered by the Cap-and-Trade Program.

Currently, there are no applicable CARB, 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; AB 32, the 2012-2035 RTP/SCS and the City of Los Angeles Green Building Ordinance and Mobility 2035 Plan.

Compliance with regulatory measures, 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 CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB'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 CARB'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 future GHG emission reduction targets established by CARB. 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. Compliance with regulatory measures 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 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 24 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project is consistent with the approach outlined in CARB'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 CARB'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 2040 GHG emission reduction targets established by CARB. 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 32 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

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, regional, 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 cumulatively less than significant.

Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.

IX. Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS					
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

F-1 Phase I Environmental Site Assessment Report, Property Solutions, Inc. March 10, 2016.

F-2 Limited Phase II Environmental Site Assessment Report, Earth Sciences, LLC. April 1, 2019.

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

residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

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

Less Than Significant Impact.

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. 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 would not involve the routine transport, use, or disposal of hazardous materials.

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. Construction hauling would be conducted according to existing standards and regulations for trucks carrying demolition debris and soils. 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 would not involve the routine use, transport, or disposal of hazardous materials. The Project would include the development of residential, commercial, and parking uses. These typical urban uses do not involve the routine use of hazardous materials. Instead, the operation of the Project would have 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. Likewise, the Project's commercial uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial and residential land uses. In other words, 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, would create 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 would be

required to 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 the operation of the Project would be less than significant.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. 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) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated.

Based on the age of the onsite structures, there is a potential for asbestos containing building materials (ACM) and lead-based paint (LBP) at the site. Observed building materials and painted surfaces appeared to be in good condition. The Project would comply with the following regulations related to ACMs and LBP:

- If asbestos containing building materials 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.
- If lead-based paint materials are found to be present, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

The Site is not within a Methane Hazard Site.¹²⁰

Phase 1 Findings

The adjacent (upgradient) property [former Surfside Cleaners at 17340 Sunset Boulevard] is a recognized environmental condition (REC) in connection with the Project Site. Property Solutions recommends conducting a review of documents on file with the Los Angeles Regional Water Quality Control Board (GeoTracker), the full report concerning the installation and sampling of the monitoring well on the Project Site, and the results of the soil vapor sample to further assess the potential for vapor encroachment at the Project Site due to the abutting

¹²⁰ <http://zimas.lacity.org/>

drycleaner. Based upon the results, further investigation may be warranted. Therefore a Phase II was conducted to assess the known PCE (tetrachloroethene) impacts in soil gas at the Site originating from the north-adjacent property.

Phase II Findings

On February 27, 2019, five borings (B-1 through B-5) were advanced at the Site to a terminal depth of 15 feet bgs in the asphalt-paved parking areas. Soil gas samples were collected in accordance with the “Advisory – Active Soil Gas Investigations, July 2015” prepared by the California Department of Toxic Substances Control (DTSC). The results of this investigation confirm that the documented release of PCE at the north-adjacent dry cleaner site has contaminated the soil gas at the Site through soil gas migration. The primary responsible parties (RPs) for the contamination at the Site are the owners and all associated entities of the north-adjacent strip mall where the dry cleaner site (the source of the PCE release) is located, and the operator and all associated entities of the former Surfside Cleaners. There may be other potential RPs, such as Spic N Span Cleaners which operated the dry cleaner site after Surfside Cleaners had ceased operations.

Earth Science recommends that the RPs notify the appropriate regulatory agency (e.g., the LARWQCB) regarding the soil gas impacts at the Site, and that the RPs enter into a Voluntary Cleanup Agreement (VCA) with the regulatory agency prior to undertaking and remediation or mitigation activities at the Site. Following the execution of the VCA, remediation or mitigation activities should be conducted under the oversight of the regulatory agency until a “No Further Action” (“NFA”) determination and approval for the redevelopment of the Site for residential use is issued by the regulatory agency.

It is anticipated that either a soil vapor extraction (SVE) system or a vapor intrusion mitigation system (VIMS) will be implemented in order to remediate or mitigate the PCE in soil gas at the Site in compliance with LARWQCB requirements.

Since the remediation/mitigation of the Site will not likely require any significant soil excavations, earthwork, or other high-impact/large-scale actions, it is anticipated that the remediation/mitigation actions can be performed in a minimally invasive manner via a SVE system or a VIMS.

An SVE system, if implemented at the Site, will remediate soil/soil gas contamination through physical removal methods (i.e., vapor extraction). Alternatively, a VIMS, if implemented at the Site, will mitigate soil/soil gas contamination through the use of an impermeable liner (i.e., vapor barrier) combined with a passive or active sub-slab vapor depressurization system. It is anticipated that the RPs will prepare a remedial action plan (RAP) for submission to the LARWQCB for review and approval prior to the implementation of any remediation or mitigation activities. The RAP will provide both a description and a detailed scope of work for the proposed remediation or mitigation actions to be performed at the Site.

See Mitigation Measure MM-Hazards-1.

Compliance with existing applicable laws would require the Site to be maintained in a neat, attractive, and safe condition at all times. On-site activities would be conducted so as not to

create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins would be maintained with a lid in working condition; such lid would be kept closed at all times. Trash and garbage collection bins would be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers would be emptied a minimum of once per week. Trash and garbage bin collection areas would be maintained free from trash, litter, garbage, and debris.

Compliance with existing applicable laws and **Mitigation Measure MM-HAZARDS-1** would ensure that impacts during construction and operation would be less than significant.

Mitigation Measure

MM-HAZARDS-1 Either a soil vapor extraction (SVE) system or a vapor intrusion mitigation system (VIMS) shall be implemented in order to remediate or mitigate the PCE in soil gas at the Site in compliance with LARWQCB requirements.

An SVE system, if implemented at the Site, shall remediate soil/soil gas contamination through physical removal methods (i.e., vapor extraction). Alternatively, a VIMS, if implemented at the Site, shall mitigate soil/soil gas contamination through the use of an impermeable liner (i.e., vapor barrier) combined with a passive or active sub-slab vapor depressurization system.

It is anticipated that the Responsible Parties shall prepare a remedial action plan (RAP) for submission to the LARWQCB for review and approval prior to the implementation of any remediation or mitigation activities. The RAP shall provide both a description and a detailed scope of work for the proposed remediation or mitigation actions to be performed at the Site.

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

Less Than Significant Impact.

The Project Site is in one-quarter mile of the following schools:¹²¹

- Westside Waldorf School, 17310 Sunset, 390 feet northeast of the Site.
- Palisades Jewish Early Childhood Center, 17315 Sunset, 360 feet northwest of the Site.

The Project would have a less than significant impact during the demolition and new construction (regulatory compliance for the removal of asbestos and lead-based paint) and, as discussed above, would not emit any hazardous substances during operation. The schools would be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard LADBS-required construction walls and sheeting to reduce dust

¹²¹ LAUSD and Google Maps.

and other emissions from the Project Site. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?**

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 above-referenced lists (see question b), above) 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.

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.¹²²

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.¹²³

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.¹²⁴

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.¹²⁵

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.¹²⁶

Therefore, 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**

¹²² California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>.

¹²³ California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>.

¹²⁴ 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>.

¹²⁵ 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/>.

¹²⁶ 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>.

project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact.

The Project is not within an airport hazard area.¹²⁷ The Project Site is located more than two miles from the Santa Monica Airport. The Site is not within the Airport Planning Boundary/Influence Area.¹²⁸ The Project Site is outside the flight path of the runways, which for arrivals is over Pico and Sepulveda.¹²⁹ In addition, the height of the building is not sufficiently high or unique to affect flight paths. Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore, no impact will occur.

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

Less Than Significant Impact.

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. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Sunset, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

In addition, there are no emergency services located within the immediate vicinity of the Project Site. Major roadways throughout the City, such as PCH, are selected disaster routes.¹³⁰

Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the routes, and emergency access would be maintained at all times. The future traffic conditions with the Project show that none of the study intersections would have a significant impact.¹³¹ The Project Site is within a Hillside Area, which would impose hillside-specific emergency access requirements.¹³² The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

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

¹²⁷ ZIMAS search: <http://zimas.lacity.org/>.

¹²⁸ <http://csmgisweb.smgov.net/docs/mapcatalog/airportinfluencearea.pdf>

¹²⁹ https://www.smgov.net/uploadedFiles/Departments/Airport/Pilots/SMO_Fixed-Wing_Propeller_Pilot_Guide.pdf

¹³⁰ Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safetyelt.pdf>.

¹³¹ *Traffic Impact Analysis*, Overland Traffic Consultants, April 2018.

¹³² ZIMAS search: <http://zimas.lacity.org/>.

Less Than Significant 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 located in a Very High Fire Hazard Severity Zone¹³³ and in a Fire Buffer Zone.¹³⁴ However, the Project would comply with LAFD Brush Clearance Requirements.¹³⁵ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, impacts would be less than significant.

¹³³ ZIMAS search: <http://zimas.lacity.org/>.

¹³⁴ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

¹³⁵ <http://www.lafd.org/fire-prevention/brush/clearance-requirements>

X. Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY					
Would the project:					
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 or through the addition of impervious surfaces, in a manner which would:				
i.	result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	In flood hazard, tsunami, or seiches zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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.¹³⁶ 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. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand 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) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include: 1. Infiltration Systems; 2. Stormwater Capture and Use; 3. High Efficiency Biofiltration/Bioretenion Systems; and 4. Combination of Any of the Above.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.¹³⁷ The City is in compliance with all requirements of the NPDES Municipal Permit.¹³⁸ Compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will not disturb

¹³⁶ 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/>.

¹³⁷ <http://water.epa.gov/polwaste/npdes/>.

¹³⁸ <http://www.lastormwater.org/about-us/npdes-municipal-permit/>.

greater than one acre of land (the entire Site is approximately 0.34 acres)¹³⁹, the Project Applicant will not 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).¹⁴⁰ 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. BMPs are methods to prevent or control stormwater runoff and the discharge of pollutants. The plan requires (1) advance planning and training to ensure implementation of the BMPs, (2) erosion and sediment control BMPs in place until the area is permanently stabilized, (3) pollution prevention BMPs to keep the construction site clean and (4) regular inspection of the construction site to ensure proper installation and maintenance of BMPs.¹⁴¹

Storm Water Pollution Prevention Plan. 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.

Low Impact Development Plan. 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.

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.

Waste Discharge Requirements (WDR). The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated

¹³⁹ See Project Description.

¹⁴⁰ 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.

¹⁴¹ <http://www.lastormwater.org/about-us/regulatory-mandates/>

groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the Project would have to obtain coverage under this permit. Construction-related impacts to water quality will be less than significant.

Operation

The Project will 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 change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type from that which currently exists. The parking for the Project would be located within the building and not subject to rain that can create runoff. 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. 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 will be less than significant.

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

Less Than Significant Impact.

A 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. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby.

Drainage appears to occur by sheetflow along existing contours towards the City streets.

No groundwater was encountered in borings extended to maximum depths of 51 feet. Published maps, however, show the historically highest groundwater level at the subject site to be near a depth of 10 feet (at the front of the site). This level is close to the contact of soil and bedrock.¹⁴²

It should be noted that it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation will be critical

¹⁴² Report of Geotechnical Investigation, AES, January 24, 2017.

for future performance of the Project.

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.¹⁴³ The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a building and parking lot (hardscape). The Project would similarly occupy the entire Project Site with new development. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

The development of the Project would not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on- or off-site?:

Less Than Significant Impact.

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 located in an urbanized area of the City. The Project would occupy the entire Project Site with buildings and paving as well as permeable landscaping. The Project Site is currently occupied by a structure and surface parking lot. Thus, the Project will not significantly increase the proportion of impermeable surfaces. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the Project would not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

The Project Site is located in an urbanized area of the City. The Project would not be altering the amount of impervious surface that affects drainage patterns. No flooding is expected to occur on- or off-site. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding would be less than significant.

iii. create or contribute runoff water which would exceed the capacity of existing

¹⁴³ LADWP, Water, Sources of Water: <https://www.ladwp.com/>.

or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact.

No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system on Sunset.¹⁴⁴ 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.

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) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

Construction

The Project would require excavation for one subterranean level and utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. In addition, regulations will ensure the safe removal of asbestos and lead from the demolition. 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. When properly designed and implemented, these "good-housekeeping" practices would reduce short-

¹⁴⁴ Navigate LA, Storm Drains Layer: <http://navigatea.lacity.org/navigatea/>.

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 would be required to comply with the LID Best Management Practices, which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPs are incorporated into the Project design plans. Compliance with existing regulations would reduce the potential for construction water quality impacts to a less than significant level.

Operation

Activities associated with operation of the Project would not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing surface parking and developing a residential project, the type of urban runoff would likely improve in quality. The parking for the Project would be located below grade, and within the building and not subject to rain that can create runoff. 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 the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

iv. impede or redirect flows?

No Impact.

This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project would not be located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.¹⁴⁵ Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based. 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.¹⁴⁶ Additionally, the Project Site is not located within a City-designated 100-year floodplain.¹⁴⁷ The Site is not within a Flood Zone.¹⁴⁸ Therefore, no impact will occur.

¹⁴⁵ 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/saftyelt.pdf>.

¹⁴⁶ FEMA, Flood Map Service Center: <https://msc.fema.gov/portal>.

¹⁴⁷ 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/saftyelt.pdf>.

¹⁴⁸ ZIMAS search: <http://zimas.lacity.org/>.

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

Less Than Significant Impact.

Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. 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.¹⁴⁹

The Project is located approximately 750 feet from the Pacific Ocean, but is not located within an area potentially impacted by a tsunami.¹⁵⁰

Based on the Geotechnical Investigation analysis, the Site is considered feasible for the Project.¹⁵¹ Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

Potential pollutants generated by the Project would be typical of residential and commercial land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Implementation of the LID measures on the Project Site would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans for Ballona Creek. In addition, with implementation of the Project's proposed landscaping, impervious surfaces would marginally decrease. The decrease in impervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

¹⁴⁹ Page II-16, Los Angeles General Plan Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

¹⁵⁰ ZIMAs search: <http://zimas.lacity.org/>.

¹⁵¹ Report of Geotechnical Investigation, AES, January 24, 2017.

XI. Land Use and Planning

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING					
Would the project:					
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Physically divide an established community?

Less Than Significant 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 is not of a scale or nature that would 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. The Project's uses are compatible with the uses along Sunset. The Project Site contains no existing residential uses and would unify, rather than divide a community. As such, impacts related to physical division of an established community would be less than significant.

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

Less Than Significant Impact.

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. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 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.4th 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.4th 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*).

The following is a list of applicable land use plans:

- SCAG's Regional Comprehensive Plan and Guide (RCPG)
- SCAG's Regional Comprehensive Plan (RCP)
- SCAG's Regional Transportation Plan (RTP)
- SCAQMD Air Quality Management Plan (AQMP)
- Metro Congestion Management Plan (CMP) for Los Angeles County
- City of Los Angeles General Plan
- Brentwood-Pacific Palisades Community Plan
- Pacific Palisades Commercial Village and Neighborhood Specific Plan
- Los Angeles Municipal Code

Consistency with Plans

SCAG 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:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.
2. A proposed residential development of more than 500 dwelling units.
3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
5. A proposed hotel/motel of more than 500 rooms.

6. 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.
7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.
8. 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.
9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.
10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.
11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.
12. 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 chapters' overall goals are to:¹⁵²

- re-invigorate the region's economy,
- avoid social and economic inequities and the geographical dislocation of communities, and
- maintain the region's quality of life.

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 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 residential and commercial uses near similar compatible uses, such as commercial uses in Los Angeles.

SCAG 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

¹⁵² SCAG, RCPG Growth Management Chapter, page 3-1:
<http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGrowthManagementChapter.pdf>.

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 B.11-1, 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.

SCAG RTP

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.¹⁵³ 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

¹⁵³ SCAG, RTP: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>

- 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
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, 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 15206.¹⁵⁴ The threshold for a residential development is more than 500 dwelling units and for a commercial building is employing more than 1,000 persons or more than 250,000 square feet. The Project would not exceed those thresholds. 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.

SCAQMD 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 2016 Air Quality Management Plan (AQMP).¹⁵⁵ The AQMP works with 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.

The 2016 AQMP was adopted in March 2017 and continues the progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP represents the most updated regional blueprint for achieving federal air quality standards and healthful air. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions, and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate strategies for reducing NO_x emissions sufficiently to meet the upcoming ozone deadline standards.

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management. As demonstrated in the following analyses, the Project would not result in significant regional emissions. Directly applicable to the Project, the 2016 AQMP proposes robust NO_x reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. The Project would be required to comply with all new regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control

¹⁵⁴ 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, January 4, 2017.

¹⁵⁵ SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>.

measures listed in the 2016 AQMP. Therefore, the Project would result in less-than significant impacts related to consistency with the regional AQMP.

Metro CMP

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.

The project-generated trips were added to intersections, and a full intersection analysis was conducted. Even when the Project added traffic, it failed to meet the minimum thresholds that require an intersection analysis.¹⁵⁶

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 goals.¹⁵⁷ 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.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Land Use Framework Element identifies the Project Site as Neighborhood Office Commercial and the LAMC identifies the Project Site as zoned C2-1VL.

General Commercial¹⁵⁸

Note that the Neighborhood Office Commercial land use designation corresponds to the General Plan's General Commercial, since the corresponding zoning is C2.

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

¹⁵⁶ Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

¹⁵⁷ California Government Code Section 65300.

¹⁵⁸ General Plan, Chapter 3-Land Use: <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm>

at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets.

Table B.11-2, General Plan Land Use, lists the goals, objectives, 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 residential and commercial uses in a commercially-designated land use area, with residential uses nearby to the north and 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.

Brentwood-Pacific Palisades Community Plan

The Community Plan was adopted on June 17, 1998.¹⁵⁹ The Community Plan is the Land Use Element of the City's General Plan. The Community Plan 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 Community Plan is intended to promote an arrangement of land use, circulation, and services that will encourage and 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 Community Plan is however over 19 years old and such policies are out dated and not in keeping with many the changes occurring in today's trends in the land use patterns and population growth of the community plan.

Table B.11-3, Community Plan, sets forth the objectives for residential and commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals, objectives, and policies. The Project would be consistent with all applicable policies related to the building's siting, location, uses, and design features.

The Project will satisfy this Goal and these Policies by providing a contemporary building on an underutilized site and provides housing along a commercial corridor. The commercial component will provide jobs and additional taxes that will contribute to and improve the economy. The commercial land use designation of the Community Plan covers most commercial development categorized as Regional, Community, General and Neighborhood.

Pacific Palisades Commercial Village and Neighborhoods Specific Plan

¹⁵⁹ Brentwood-Pacific Palisades Community Plan: <http://cityplanning.lacity.org/complan/pdf/btwcptxt.pdf>

The Specific Plan was adopted on August 7, 2016.¹⁶⁰ The Site is within Neighborhood Area B (Sunset Boulevard at Pacific Coast Highway). No building permit shall be issued for any Project unless the Project meets the requirements of Sections 6, 7, 8, 9, 10 and 11 of the Specific Plan as determined by the Department of Building and Safety, and also meets the requirements of Sections 12, 13, and 14 of the Specific Plan as determined by the Director of Planning.

The Project is fully consistent with the Specific Plan's goals and objectives and will both complement and contribute to the surrounding Sunset Boulevard commercial corridor. A parcel that has stood underutilized for two years as a vacant fast food restaurant will be replaced by a stylishly-designed, mixed-use development providing retail uses and mixed-income housing in a community facing a shortage of both.

The intent of the Specific Plan is to maximize Sunset Boulevard's development potential as a commercial corridor while keeping the neighborhood character intact. The Project will locate 40 dwelling units at the Project Site, while placing the Project's commercial uses at the ground level fronting Sunset Boulevard. The commercial uses will not impact existing residential uses, the nearest of which are situated behind and well upslope of the Project Site, and in a mixed-use development on the other side of Sunset Boulevard. The Project locates the bulk of its parking underground, with the above-grade parking adequately screened from neighboring properties and Sunset Boulevard.

The Project is designed to be inviting for walk-up customers. Furthermore, the Project combines residential and commercial uses, thereby providing the Project's commercial uses with a nearby customer base and providing the Project's residents with commercial amenities. The Project's 2,900 square feet of commercial floor area will provide small, neighborhood serving commercial spaces that will help promote Specific Plan's pedestrian-friendly goals.

All utilities and public services are adequate to service the Project without impacting the public necessity, convenience or general welfare. Specifically, the Project has adequate street access to Sunset Boulevard. Furthermore, the Project is adequately served by existing sewers, drainage facilities and water treatment facilities. Additional analysis and mitigation measures are discussed in the environmental document accompanying this application.

In addition to satisfying the Specific Plan's goals and objectives, the Project also complies with the Specific Plan's specific regulations, findings, standards, and provisions, as demonstrated below:

Section 6. Land Use – The Project combines residential and commercial uses in a manner encouraged by the Specific Plan. At Subsections B and C, the Specific Plan explicitly permits both ground floor retail and mixed use, with commercial uses on the ground floor and residential uses above. And while density bonus waiver of development standards are necessary to achieve the height and FAR necessary to build the Project, the requested height and FAR are both similar to those permitted under the General Plan.

¹⁶⁰ <http://cityplanning.lacity.org/complan/specplan/pdf/PACPALSP.PDF>

Section 7. Height – The Project is utilizing an off-menu density bonus waiver of development standard to exceed the Specific Plan's two-story, 30-foot height limitation. Nevertheless, the Project's location at the base of a steep slope provides a unique opportunity to build a structure taller than otherwise permitted with no height or massing impacts to nearby residential uses.

Section 8. Floor Area Ratio – As discussed in detail above, the Applicant seeks relief from the FAR restrictions set forth in the Specific Plan by way of an off-menu density bonus waiver of development standard. While the Project's proposed FAR of 2.15:1 doubles the Specific Plan's highly restrictive 1:1 FAR, it represents a modest increase over the otherwise applicable 1.5:1 FAR allowed by the General Plan. The topography surrounding the Property will ensure that the community impacts at the heart of the Specific Plan's limited FAR do not materialize.

Section 9. Setbacks – The Project complies with the minimum two-foot setback requirement set forth in Section 9 of the Specific Plan.

Section 10. Parking – After deducting a credit for the inclusion of bicycle parking, the Project provides sufficient residential parking to satisfy both the Specific Plan and the Option 1 density bonus parking requirements set forth in LAMC Section 12.22 A.25. The Project also provides commercial parking at a ratio of one space for every 300 square feet of retail floor area, as required by Section 10 of the Specific Plan. Section 10(d) of the Specific Plan requires that projects consisting of new buildings provide bicycle parking at a ratio of two spaces for every one thousand square feet of floor area, regardless of use. The Project includes 32,225 square feet of floor area, and accordingly provides 49 automobile parking spaces. The Project also satisfies the LAMC's bicycle parking requirements by providing the 65 required bicycle parking spaces.

Section 11. Alcohol Consumption Regulations – Commercial Village Subarea A – The Project is not situated within Commercial Village Subarea A, and therefore this section is not applicable.

Section 12. Landscaping Standards and Urban Design Features – The Project will comply with the Specific Plan's standards for landscaping and urban design features.

Section 13. Sign Standards – The Project will comply with the Specific Plan's sign standards.

Section 14. Design Review Procedures – The Project will be submitted to the local Design Review Board for evaluation and recommendation to the Director of Planning.

The Project is requesting a design review pursuant to LAMC section 16.50 E to determine the project is in compliance with the Pacific Palisades Specific Plan

Coastal Development Approval

The California Coastal Zone Conservation Act (CZCA) regulates construction in the "coastal zone" extending seaward to the State's outer limit of jurisdiction and extending inland generally 1000 yards from the mean high tide line (Section 30103, Public Resources Code (PRC)). Most developments within the State Coastal Zone will be required to obtain a Coastal Clearance from either the Planning Department Development Services Counter or the State Coastal

Commission Office. Being in a single jurisdiction area, the Project will require coastal development approval only from the City and not from the State Coastal Commission.

LAMC section 12.20.2 requires that all of the findings be made in the affirmative before a coastal development permit may be granted. See **Table B.11-4**.

The Project is requesting a Mello Act Compliance determination pursuant to California Government Code section 65590 and 65590.1 for projects located within the California Coastal Zone.

City of Los Angeles Planning and Zoning Code

The Specific Plan specifically allows mixed-use projects. Section 6(B) of the Specific Plan provides that residential uses may occupy the upper floors of a building as long as certain design standards prescribed within the Specific Plan are satisfied. The Project will comply with the Specific Plan in all respects except for building height and FAR, for which waivers have been requested as density bonus incentives.

In addition to a ministerial affordable housing density bonus of 15%, implementation of the Project will require multiple discretionary approvals. Specifically, the Applicant requests a Coastal Development Permit and Project Permit Compliance for a Project located within the Specific Plan Area. The Applicant also requests a waiver from two aspects of the Specific Plan pursuant to Government Code section 65915(e) and LAMC section 12.22 A.25(g)(3): two off-menu density bonus incentives to permit a height of five stories and 60 feet, 9 inches in lieu of the Specific Plan's maximum of two stories and 30 feet, and an FAR of 2.15:1 in lieu of the Specific Plan's maximum 1:1 FAR.

Situated on a lot of approximately 14,963 square feet, the Project will contain approximately 32,225 total square feet of floor area, giving the Project an FAR of approximately 2.15:1.¹⁶¹ Projects in the Specific Plan are allowed a by-right FAR of 1:1. The Project will achieve its proposed floor area ratio by utilizing an off-menu density bonus incentive.

The Project Site is zoned C2-1VL. Pursuant to the General Plan and LAMC sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum residential density within the C2 zone is one unit for every 400 square feet of lot area. While the 1VL height district would typically allow an FAR of 1.5:1 and a height of three stories and 45 feet, the Specific Plan limits FAR to 1:1 and the maximum allowed height is two stories and 30 feet. The Project is proposed to be five stories and 60 feet, 9 inches in height. Projects in the Specific Plan are allowed a maximum by-right height of two stories and 30 feet. Project implementation will require a second off-menu density bonus incentive to accommodate the Project's height.

Conclusion

¹⁶¹ FAR is calculated by dividing the Project's total floor area by the Property's buildable area. In the C2 zone, the Property's buildable area is equal to its lot area unless a D Limitation restricting floor area was imposed prior to July 1, 1997. No such D limitation has been imposed upon the Property.

The requested discretionary actions, including the density bonus waiver of FAR and height development standards, do not conflict with urban land uses in the area and the Project would not introduce a new incompatible use. In fact the Project promotes many of the goals and policies of the Community Plan. The area supports residential and commercial uses. The proposed 5-story building would be comparable with other structures in the area, and thus will not introduce an incompatible scenic element into the community. Moreover, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project, therefore, considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site, based on detailed review of the relevant documents. Therefore, impacts would be less than significant.

Table B.11-1
SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing ¹	
<p>LU-6.2 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>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through regulatory 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>
Open Space and Habitat ²	
<p>OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open 	<p>Consistent. 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 Los Angeles surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. The Site contains non-protected trees along the rear of the Site.</p>

Policies	Discussion
<p>space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements.</p> <ul style="list-style-type: none"> Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects. 	
<p>OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>Not Applicable. OSC-9 does not apply to this Project as it is not next to natural areas for outdoor recreation. The Project would not impede access to natural lands.</p>
<p>OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project is an infill development in an existing community.</p>
<p>OSC-11 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.</p>	<p>Consistent. 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 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. The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<p>OSC-12 Developers and local governments should promote water-efficient land use and development.</p>	<p>Consistent. 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 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. The Code is designed to reduce the building's energy and water use, reduce waste, and reduce the carbon footprint.</p>
<p>OSC-13 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.</p>	<p>Consistent. The Project would contain multiple uses (residential and commercial) and will redevelop an underutilized infill site.</p>
<p>Water³</p>	
<p>WA-9 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</p>	<p>Consistent. The Project includes conservation features (regulatory measures) to reduce operational water use, per LADWP and LAMC requirements.</p>

Policies	Discussion
resources for both year-round use and ecosystem health.	
WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.	Consistent. 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 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.
WA-11 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.	Consistent. 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.
WA-12 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.	Consistent. The Project would include landscaping on the ground floor that is irrigated with water conservation techniques
WA-13 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.	Consistent. The Project would not impact wetlands.
WA-27 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.	Consistent. The Site is currently developed with buildings and surface parking. The Project will cover the entire site with a building and landscaping. The Project will not result in a significant increase in the amount of impervious surface area at the Project Site.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	Consistent. 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. The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy ⁴	
EN-8 Developers should incorporate and local governments should include the	Consistent. The Project would be a mixed-use development that is in

Policies	Discussion
<p>following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips. 	<p>proximity to local transit lines, including Metro buses. The Project would encourage biking and walking trips due to bicycle parking and its location within a pedestrian-oriented area along Sunset.</p>
<p>EN-10 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"> • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements. • 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. • 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 http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to 	<p>Consistent. The Project would be in compliance with the City's Green Building Ordinance, which contains energy efficient practices.</p>

Policies	Discussion
<p>generate their own electricity</p> <ul style="list-style-type: none"> • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy. 	
<p>EN-11 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 improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p>Consistent. The LADWP does not provide consumption rates so the SCAQMD rates are used to calculate estimated electrical usage for the Utilities section of this analysis. Electrical service is available and will be provided in accordance with the LADWP's 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.</p>
<p>EN-12 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.</p>	<p>Consistent. This is an encouragement to incorporate solar panels, not a requirement. The Project would have an activated roof with uses.</p>
<p>EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.</p>	<p>Consistent. The Project commercial component would comply with the LAMC requirements for all mandatory (Code-required) transportation measures to reduce single-occupancy vehicle trips.</p>
<p>Solid Waste ⁵</p>	
<p>SW-14 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"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap 	<p>Consistent. 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.</p>

Policies	Discussion
<p>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.).</p> <ul style="list-style-type: none"> • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	
<p>SW-17 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.</p>	<p>Not Applicable. The Project would not be a composting, recycling, or conversion technology facility.</p>
<p>SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.</p>	<p>Not Applicable. The Project would not be a waste management facility.</p>
<p>SW-19 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.</p>	<p>Not Applicable. The Project would not be an eco-industrial park.</p>
<p>SW-20 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.</p>	<p>Not Applicable. The Project would not be a solid waste management facility.</p>
<p>SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf ¹ Page 21; ² Pages 34 and 39; ³ Pages 59-61; ⁴ Pages 75-76; ⁵ Pages 105-106 Table: CAJA Environmental Services, January 2018.</p>	

**Table B.11-2
General Plan Land Use**

Goal, Objective, Policies	Discussion
General Commercial	
GOAL 3H Lower-intensity highway-oriented and local commercial nodes that accommodate commercial needs outside centers and districts.	Consistent. The Project would include commercial uses that accommodate commercial needs outside centers and districts.
Objective 3.12 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.	Consistent. The Project maintains the uses, density, and character of existing low-intensity area and is precluded from intensification due to the limitations on its dimensions under the entitlements requested.
Policy 3.12.1 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.	Consistent. According to Table 3-1, the General Commercial category has the following typical uses: <ul style="list-style-type: none"> • Uses as permitted by existing zoning (generally, uses permitted in the C2 zone). • Modifications to be determined by the community plans • Potential adjustment of density to reflect parcel size and configuration, intended functional role, and characteristics of surrounding uses determined through the community plan process The Project includes uses permitted in the C2 zone such as residential and commercial uses. According to Table 3-7, the General Commercial land use designation corresponds to C2 zone for the Project Site.
Policy 3.12.2 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: <ol style="list-style-type: none"> a. Where commercial parcels of less than 150 feet in depth abut areas designated for single-family residential; 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; c. Where site driveways may adversely impact traffic flows along principal streets or in adjacent residential neighborhoods; and/or d. Where there are local community objectives for the preservation of the prevailing scale and character of development. 	Consistent. The Project density is consistent with the zoning and density bonus allowances. The Site has less than 150 feet in depth but does not abut single-family residential. The Site can accommodate the required parking. The Site driveway would replace an existing driveway and not impact traffic flows.
Policy 3.12.3 Permit the re-construction of existing commercial structures destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing intensity.	Not Applicable. The Project Site was not affected by the natural disasters listed.
General Plan, Chapter 3-Land Use, General Commercial: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm	

**Table B.11-3
Community Plan**

Objective and Policies	Discussion
Residential	
Objective 1-1 To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	Consistent. The Project includes new housing development.
Policy 1-1.1 The City should promote neighborhood conservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple-family residences.	Consistent. The Project would not encroach on any existing residential community.
Policy 1-1.2 Maintain the existing acreage of residential lands designated for single family use.	Consistent. The Project would not encroach on existing residential acreage for single-family use.
Policy 1-1.3 Maintain a substantial portion of the single family areas in the minimum density land use category.	Consistent. The Project would not affect land for single-family uses.
Objective 1-2 To locate new housing in a manner which reduces trips and makes it accessible to services and facilities.	Consistent. The Project includes new housing near commercial center along Sunset.
Policy 1-2.1 Retain higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate such development and circulation system.	Consistent. The Project includes new housing near bus stops.
Policy 1-2.2 Encourage multiple residential development in specified commercial zones.	Consistent. The Project includes multiple family residential in a commercial zone.
Policy 1-2.3 Establish transitional zones between low and high density residential areas.	Consistent. The Project provides a transition between the commercial density on Sunset and low density on the residential community east of Sunset.
Policy 1-2.4 Residential densities shall not be increased beyond those permitted in the Community Plan unless the necessary infrastructure and transportation systems are available to accommodate the increase.	Consistent. The Project density is allowed using a density bonus by providing affordable units.
Objective 1-3 To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	Consistent. The Project has a contemporary design that integrates into the existing residential neighborhood which includes a variety of styles.
Policy 1-3.1 Seek a higher degree of architectural compatibility and landscaping for new development to protect the character and scale of existing residential neighborhoods.	Consistent. The Project has a contemporary design that integrates into the existing residential neighborhood which includes a variety of styles.
Policy 1-3.2 Preserve existing views in hillside areas.	Consistent. The Project would not affect private views since it is downslope from hillside areas.
Policy 1-3.3 Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public	Consistent. The Project environmental analysis considers such factors. Impacts would be less than significant.

Objective and Policies	Discussion
facilities, and impacts on traffic levels when changes in residential densities are proposed.	
Objective 1-4 To preserve and enhance neighborhoods with a distinctive and significant historic character.	Not Applicable. The Project would not affect any historic resources.
Policy 1-4.1 Protect and encourage reuse of the area's historic resources.	Not Applicable. The Project would not affect any historic resources.
Policy 1-4.2 Preserve architecturally or historically significant features and incorporate such features as an integral part of new development when appropriate.	Not Applicable. The Project would not affect any historic resources.
Objective 1-5 To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.	Consistent. The Project includes a variety of types and price points, including affordable.
Policy 1-5.1 Promote greater individual choice in type, quality, price and location of housing.	Consistent. The Project includes a variety of types and price points, including affordable.
Policy 1-5.2 Promote housing in mixed use projects in pedestrian-oriented areas and transit corridors.	Consistent. The Project includes mixed-uses (residential and commercial) along Sunset.
Policy 1-5.3 Ensure that new housing opportunities minimize displacement of the residents.	Consistent. The Project Site contains no existing housing or residents.
Policy 1-5.4 Provide for the development and maintenance of rental units to insure housing for a variety of income groups.	Consistent. The Project would be rental apartment units.
Objective 1-6 To limit the intensity and density in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography.	Consistent. The Project geotechnical report states that the Project is feasible.
Policy 1-6.1 Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	Consistent. The Project traffic study evaluated the circulation system and concluded that impacts would be less than significant.
Policy 1-6.2 Ensure the availability of adequate sewers, drainage facilities, fire protection services and other public utilities to support development within hillside areas.	Consistent. The Project environmental analysis considers such factors. Impacts would be less than significant.
Policy 1-6.3 Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area.	Consistent. The Project geotechnical report states that the Project is feasible.
Policy 1-6.4 Encourage clustering of single family residences in order to use the natural terrain to the best advantage.	Not Applicable. The Project does not include single-family residences.
Policy 1-6.5 Require that any proposed development be designed to enhance and be compatible with adjacent development.	Consistent. The Project provides a transition between the commercial uses on Sunset (to the north) and the residential uses to the east behind the Site.

Objective and Policies	Discussion
Policy 1-6.6 The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.	Not Applicable. The Project Site is developed and paved.
Commercial	
Objective 2-1 To conserve and strengthen viable commercial development	Consistent. The Project includes commercial uses.
Policy 2-1.1 New commercial uses shall be located in existing established commercial areas or shopping centers.	Consistent. The Project includes commercial uses in an established corridor.
Policy 2-1.2 Protect commercially planned or zoned areas, from encroachment by residential only development.	Consistent. The Project includes a mix of uses (residential and commercial).
Policy 2-1.3 Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	Consistent. The Project includes a mix of uses (residential and commercial) that would support existing uses in the area.
Objective 2-2 Allow for the development of automobile-related uses in specific commercial designations along boulevards.	Consistent. The Project includes commercial uses along Sunset Boulevard.
Policy 2-2.1 Prohibit the development of new automobile - related uses in pedestrian-oriented areas.	Consistent. The Project does not include automobile-related uses such as gas station or repair.
Policy 2-2.2 Permit the development of new automobile-related uses in some designated commercial areas.	Consistent. The Project does not preclude development of automobile-related uses in other areas.
Policy 2-2.3 Require screening of open storage and auto repair uses, and prohibit storage of automobile parts and other noxious commercial related products in front of commercial development exposed to the street.	Not Applicable. The Project does not include automobile-related uses such as gas station or repair.
Objective 2-3 To enhance the appearance of commercial districts and to identify pedestrian-oriented areas.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-3.1 Pedestrian-oriented areas are to be identified and preserved.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-3.2 New development should add to and enhance the existing pedestrian street activity.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-3.3 Ensure that commercial projects achieve harmony with the best of existing development.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-3.4 New development in pedestrian oriented areas shall provide parking at the rear of the property or underground.	Consistent. Parking will be provided within the building and underground.
Policy 2-3.5 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts,	Consistent. The Project ground floor commercial uses would be directed at pedestrians.

Objective and Policies	Discussion
incorporate commercial uses directed at pedestrian traffic.	
Policy 2-3.6 Promote mixed-use projects along transit corridors, and in appropriate commercial areas.	Consistent. The Project includes a mix of uses (residential and commercial) that would support existing uses in the area.
Policy 2-3.7 Encourage large mixed use projects and other large new development projects in the transit corridor along Wilshire Boulevard to incorporate human service facilities as part of the project.	Not Applicable. The Project is not a large mixed use project along Wilshire Boulevard.
Objective 2-4 To enhance the appearance of commercial districts consistent with the character of, and quality of the surrounding neighborhoods.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-4.1 Establish commercial areas and street identity and character through appropriate sign control, landscaping and street scape.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-4.2 Preserve community character, scale and architecture diversity.	Consistent. The Project has a contemporary design aesthetic with ground floor commercial uses.
Policy 2-4.3 Improve safety and aesthetics of parking areas in commercial areas.	Consistent. The Project would upgrade a vacant Site with a mixed use building that includes safety and aesthetic considerations.
Policy 2-4.4 Landscape corridors should be created and enhanced and maintained through the planting of street trees.	Consistent. The Project will be landscaped as required by the Pacific Palisades Commercial Village and Neighborhoods Specific Plan.
Urban Design	
Multiple Residential (Site Planning)	
1. Provide a pedestrian entrance at the front of each project.	Consistent. Pedestrian access would be provided on Sunset Boulevard.
2. Require useable open space for outdoor activities, especially for children.	Consistent. The Project includes code-required open space.
Commercial (Site Planning)	
1. Locating surface parking to the rear of structures.	Consistent. Parking would be contained within the building below grade and thus separated from any nearby residential use.
2. Minimizing the number of widths of driveways, and providing sole access to the rear of commercial lots.	Consistent. Parking would be accessed from an existing curb cut and driveway on the south corner of the Site on Sunset.
3. Maximizing retail and commercial service uses along frontages of commercial developments.	Consistent. Commercial use on the ground floor would activate Sunset Boulevard.
4. Providing front pedestrian entrances for businesses fronting on main commercial streets.	Consistent. Pedestrian access would be on Sunset Boulevard.
5. Providing through arcades from the front of buildings to rear parking for projects within wide frontages.	Not Applicable. Parking would be within the building.
6. Providing landscaping strips between driveways and walkways accessing the rear of properties.	Not Applicable. Vehicle access would not be parallel to walkways.
7. Providing speed bumps for driveways paralleling walkways for more than 50 feet.	Not Applicable. Vehicle access would not be parallel to walkways.
8. Requiring site plans which include ancillary structures, service areas,	Consistent. This will be provided, to the extent feasible and

Objective and Policies	Discussion
pedestrian walkways, vehicular paths, loading areas, drop off and landscape areas.	practicable.
9. Providing where feasible, the under grounding of new utility service.	Consistent. This will be provided, to the extent feasible and practicable.
10. Screening of mechanical and electrical equipment from public view.	Consistent. Mechanical equipment will be properly screened.
11. Screening of all rooftop equipment and building appurtenances from public view.	Consistent. Rooftop equipment will be properly screened.
12. Requiring the enclosure of trash areas for all projects.	Consistent. Trash areas would be enclosed and screened.
Source: Brentwood-Pacific Palisades Community Plan: http://cityplanning.lacity.org/complan/pdf/btwcptxt.pdf Table: CAJA Environmental Services, January 2018.	

**Table B.11-4
Coastal Zone**

Findings	Discussion
<p>1. The development is in conformity with Chapter 3 of the California Coastal Act of 1976 (commencing with Section 30200 of the California Public Resources Code).</p> <p>Chapter 3 of the Coastal Act contains the various policy provisions of the legislation. Public Resources Code section 30250(a) states the following regarding new development:</p> <p>New residential, commercial, or industrial development ... shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources...</p>	<p>The Project is located within a commercial corridor along a major highway. The Project area is developed and adequately served by significant infrastructure. By replacing a vacant, closed-off restaurant and providing all of the parking required under both the Specific Plan and the LAMC, the Project will not incrementally diminish coastal access. The Project will neither interfere with nor reduce access to the shoreline because the Project is not located near any shoreline.</p> <p>Further, the Project will not result in any adverse effects on coastal recreation opportunities, public views, or the marine environment. There will be no dredging, filling, or diking of coastal waters or wetlands associated with the Project, nor impacts to any sensitive habitat areas or archeological or paleontological resources.</p> <p>The Project will be subject to compliance with a comprehensive soils and geology report following approval by the Department of Building and Safety. Other City departments will also review the Project, including the Fire Department, the Bureau of Engineering and the Department of Transportation. Those reviews will serve the Coastal Act's objective of minimizing risk to life and property in areas of high geologic, flood and fire hazard, and assure the stability and structural integrity of the Project. Thus, the Project will be in conformity with the Coastal Act.</p>
<p>2. The permitted development will not prejudice the ability of the City of Los Angeles to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act of 1976.</p>	<p>Public Resources Code section 30604(a) states that prior to the certification of a Local Coastal Program ("LCP"), a coastal development permit may only be issued if the a finding can be made that the proposed development is in conformance with Chapter 3 of the Coastal Act. As discussed in greater detail above, the Project is consistent with Chapter 3 of the Coastal Act. The Project therefore will not prejudice the ability of the California Coastal Commission to eventually certify a Local Coastal Program for the City of Los Angeles.</p>

Findings	Discussion
<p>3. The Interpretative Guidelines for Coastal Planning and Permits as established by the California Coastal Commission dated February 11, 1977 and any subsequent amendments thereto have been reviewed, analyzed, and considered in the light of the individual project in making its determination.</p>	<p>The Los Angeles County Interpretative Guidelines were adopted by the California Coastal Commission (October 14, 1980) to supplement the Statewide Guidelines. Both regional and statewide guidelines, pursuant to Section 30620 (b) of the Coastal Act, are designed to assist local governments, the regional commissions, the commission, and persons subject to the provisions of this chapter in determining how the policies of this division shall be applied to the coastal zone prior to the certification of a local coastal program. As stated in the Regional Interpretative Guidelines, the guidelines are intended to be used “in a flexible manner with consideration for local and regional conditions, individual project parameters and constraints, and individual and cumulative impacts on coastal resources. The Regional Interpretive Guidelines have been reviewed and the proposed project is consistent with the requirements for the Pacific Palisades Subarea.</p>
<p>4. The decision of the permit granting authority has been guided by any applicable decision of the California Coastal Commission pursuant to Section 30625(c) of the Public Resources Code.</p>	<p>A review of projects in the vicinity has revealed no facts or issues indicating a likely conflict between the decision on this Project and any other decision of the Coastal Commission concerning development in the Pacific Palisades area.</p>
<p>5. If the development is located between the nearest public road and the sea or shoreline of any body of water located within the coastal zone, that the development is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976.</p>	<p>The Project is not located between the sea and the nearest public road; Pacific Coast Highway lies between the Project and the sea.</p>
<p>6. Any other finding or findings as may be required for the development by the California Environmental Coastal Act.</p>	<p>The Project’s potential environmental effects will be analyzed and mitigated in accordance with the California Environmental Quality Act (“CEQA”).</p>
Table: CAJA Environmental Services, January 2018.	

XII. Mineral Resources

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

a) 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.

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 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.¹⁶² 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.¹⁶³ Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor 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 are #18 Sawtelle Oil Field, located near Veteran and Le Conte and #5, Cheviot Hills Oil Field, located near Pico and Beverly.¹⁶⁴ The California Department of Conservation has more detailed online mapping of wells. No oil wells exist on the Project Site.¹⁶⁵ Therefore, no impact would occur.

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

No Impact.

The Project Site is not delineated as a locally important mineral resource recovery site on any

¹⁶² City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>.

¹⁶³ City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>.

¹⁶⁴ City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

¹⁶⁵ California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>.

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 sensitive residential receptors. Thus, the Site would not be an adequate candidate for mineral extraction. Therefore, no impact would occur.

XIII. Noise

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE					
Would the project result in:					
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The section is based, in part, on the following item, included as **Appendix G** of this MND:

G Noise Appendices, DKA Planning, February 2018.

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

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 B.13-1 provides examples of A-weighted noise levels from common sources.

**Table B.13-1
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
Source: US Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.	

Noise Definitions

This noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL).

- **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 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.
- **Community Noise Equivalent Level.** CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is perceived as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as “point sources,” can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots), and even more over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources 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 that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA.¹⁶⁶ However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

It should be noted that because decibels are logarithmic units they cannot be simply added or subtracted. For example, two cars producing 60 dBA of noise each would not produce a combined 120 dBA.

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to

¹⁶⁶ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

noise subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.¹⁶⁷ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.¹⁶⁸

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq} , and that individual noise events of 45 dBA or higher be limited.¹⁶⁹ Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq} . Individual exterior events of 60 dBA or higher should also be limited.

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

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response.¹⁷⁰ However, few people are highly annoyed at noise levels below 55 dBA L_{eq} .¹⁷¹

Regulatory Framework

Federal

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

State

State of California 2017 General Plan. The State’s 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities.

¹⁶⁷ National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

¹⁶⁸ World Health Organization, Guidelines for Community Noise, 1999.

¹⁶⁹ Ibid.

¹⁷⁰ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

¹⁷¹ World Health Organization, Guidelines for Community Noise, 1999.

Table B.13-2 illustrates State compatibility considerations between various land uses and exterior noise levels.

**Table B.13-2
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 Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix D), Figure 2, 2017.

City of Los Angeles

Los Angeles General Plan Noise Element. The City of Los Angeles General Plan includes a Noise Element that includes policies and standard to guide for the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts that preserve acceptable noise environments for all types of land uses. However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a proposed project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in **Table B.13-2** above, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Los Angeles Ordinances. 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.

Los Angeles Municipal Code. The City of Los Angeles Municipal Code (LAMC) contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, Sunday, or national holiday.

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of

construction vehicles and equipment that would be necessary for Project demolition and grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.), from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line.

Section 112.02(a) would prevent Project HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

Existing Conditions

Though the Project site is located alongside a busy roadway with high ambient noise levels, there are a number of noise-sensitive receptors in the vicinity of the Project. Land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivity to noise and proximity to the Project site:

Westside Waldorf School – Outdoor Areas. Westside Waldorf School is a private pre-K to 8th grade school located at 17310 Sunset Boulevard. This receptor represents the school's blacktop, playground, and grassy areas, which are as near as 180 feet north of the Project site. These areas have a limited line of sight to the Project.

Westside Waldorf School – Classrooms. This receptor represents the school's classroom buildings, located to the campus' northern end near Los Liones Drive. These classrooms are approximately 390 feet north of the Project site and also have a limited line of sight to the Project.

Palisades Jewish Early Childhood Center. The Palisades Jewish Early Childhood Center is associated with Chabad of Pacific Palisades community center, located at 17315 Sunset Boulevard approximately 360 feet north of the Project site.

Edgewater Towers Condominiums. This residential complex consists of two condominium towers located atop the bluffs to the east of the Project. The nearest residential tower is located approximately 60 feet east of the Project site. However, the distance to actual residences is closer to 110 feet. And given the terrain of the bluffs separating the Project site and this receptor, lower level residential units that are nearest to the Project would have limited line of sight to the Project's ground and sub-ground-level construction activities (i.e., demolition of the existing on-site structure, excavation for the underground parking garage, and grading for the Project).

17311 Castellammare Drive Residences. This multi-family residential building is located approximately 370 feet southwest of the Project near the intersection of Sunset Boulevard and Castellammare Drive. It has a limited line of sight to the Project.

DKA Planning took two short-term noise readings at locations along Sunset Boulevard near the Project site to determine the ambient noise conditions at nearby sensitive receptors.¹⁷² See **Table B.12-8**. Ambient noise levels were estimated with respect to each receptors' distance from Sunset Boulevard, the primary source of noise in the area. This estimation was utilized to more accurately account for each receptor's setback from this roadway.

For example, the Edgewater Towers Condominiums receptor is located approximately 140 feet from Sunset Boulevard; a noise measurement taken along Sunset Boulevard and directly applied to this receptor would likely exaggerate its true ambient noise level. The distance to this receptor attenuates the traffic noise from Sunset.

For Palisades Jewish Early Childhood Center and the Westside Waldorf School receptors, a noise measurement taken along Sunset Boulevard near the intersection of Los Liones Drive was utilized as the baseline value from which to estimate their respective ambient noise levels.

For Edgewater Towers Condominiums and 17311 Castellammare Drive Residences, a noise measurement taken on Sunset Boulevard near Castellammare Drive was used.

Table B.13-3
Existing Ambient Noise Levels

Noise Monitoring Location	Existing Ambient Noise Level (dBA L_{eq})
1. Sunset Blvd. – near Castellammare Dr.	70.0
2. Sunset Blvd. – near Los Liones Dr.	72.8
Source: DKA Planning, 2018	

Project Impacts

Construction Noise

Regulated Noise Sources

During all construction phases, noise-generating activities could occur at the Project site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. On-site construction activities would include the use of heavy equipment such as excavators, loaders, and similar tractor or dozer-type vehicles. Smaller equipment such as forklifts, skid steer loaders, generators, and various powered hand tools would also be used. Off-site secondary noises would be generated by sources such as construction worker vehicles, vendor deliveries, and haul trucks. **Table B.13-3** lists the hourly noise levels of construction vehicles and equipment that could be utilized for the Project.

¹⁷² Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental 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.

Table B.13-3
Construction Vehicles and Equipment - Unmitigated

Noise Source	Noise Level (dBA, 1-hr L _{eq}) ¹					
	50 feet	100 feet	150 feet	200 feet	250 feet	300 feet
Auger Drill Rig	77.4	71.3	67.8	65.3	63.4	61.8
Backhoe	73.6	67.6	64.0	61.5	59.6	58.0
Concrete Mixer Truck	74.8	68.8	65.3	62.8	60.8	59.3
Concrete Pump Truck	74.4	68.4	64.9	62.4	60.4	58.8
Crane	72.6	66.6	63.0	60.6	58.6	57.0
Dozer	77.7	71.7	68.1	65.6	63.7	62.1
Dump Truck	72.5	66.5	62.9	60.4	58.5	56.9
Excavator	76.7	70.7	67.2	64.7	62.8	61.2
Front End Loader	75.1	69.1	65.6	63.1	61.2	59.6
Gradall	79.4	73.4	69.9	67.4	65.4	63.9
Paver	74.2	68.2	64.7	62.2	60.2	58.6
Roller	73.0	67.0	63.5	61.0	59.0	57.4
Welder	70.0	64.0	60.5	58.0	56.0	54.5
¹ Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1). Source: DKA Planning, 2018.						

Section 112.05 of the LAMC establishes a maximum noise level of 75 dBA at 50 feet for powered construction equipment operating in or within 500 feet of residential zones. Though the Project is not located within a residential zone, it is located within 500 feet of numerous residential zones both east and west of Sunset Boulevard. And as shown in **Table B.13-3**, the Project's construction noise levels from certain powered equipment could exceed 75 dBA at a distance of 50 feet. This impact would be considered significant but mitigable.

On-site Noise

Noise from grading activities is typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities would include excavators, loaders, graders, and backhoes.

Construction activities would not occur between 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at all on Sunday.

For this Project, noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively to excavate and grade for the Project, particularly its underground parking level. Excavators can produce average peak noise levels of 80.7 dBA at a reference distance of 50 feet; front-end loaders, 79.1 dBA.¹⁷³

¹⁷³ Reference noise levels obtained from the Federal Highway Administration's Roadway Construction Noise Model.

Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and debris, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders typically have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The projected noise impacts from excavators and front-end loaders are shown in **Table 13-4** and summarized below.

Table B.13-4
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Westside Waldorf School – Outdoor Areas	180	62.9	61.1	65.1	4.0
Westside Waldorf School – Classrooms	390	56.2	64.8	65.4	0.6
Palisades Jewish Early Childhood Center	360	61.9	67.5	68.5	1.0
Edgewater Towers Condominiums	110	54.9	52.9	57.0	4.1
17311 Castellammare Drive Residences	370	56.6	54.9	58.9	4.0
Source: DKA Planning, 2018.					

It should be noted that the modeling of these construction noise impacts did not incorporate the mitigation measures required for the Project to comply with Section 112.05 of the LAMC. **Table B.13-5** shows the Project's construction noise impacts with the incorporation of **Mitigation Measures MM-Noise-1** and **MM-Noise-2**.

Table B.13-5
Construction Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Westside Waldorf School – Outdoor Areas	180	54.9	61.1	62.0	0.9
Westside Waldorf School – Classrooms	390	48.2	64.8	64.9	0.1
Palisades Jewish Early Childhood Center	360	53.9	67.5	67.7	0.2
Edgewater Towers Condominiums	110	54.2	52.9	56.6	3.7
17311 Castellammare Drive Residences	370	48.6	54.9	55.8	0.9
Source: DKA Planning, 2018.					

With regard to off-site construction-related noise impacts, grading activities would require haul trucks to export excavated soils from the Project site to a regional landfill. Such activity can marginally increase ambient noise levels at any roadside sensitive receptors. However, Project haul trucks would access the site via Sunset Boulevard, avoiding sensitive residential streets where intermittent truck noises could have a greater impact on surrounding noise levels. On Sunset Boulevard and other major roadways, the addition of Project haul trucks would have a

negligible impact. As a result, the Project's impact from off-site construction noise sources would be considered less than significant.

Mitigation Measures

Mitigation Measures MM-Noise-1 and **MM-Noise-2** are recommended to reduce the Project's on-site construction source noise levels to below LAMC Section 112.05's 75 dBA limit for powered construction equipment operating in or within 500 feet of residential zones.

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

Mitigation Measures

MM-Noise-1 All capable diesel-powered construction vehicles shall be equipped with exhaust mufflers or other suitable noise reduction devices.

MM-Noise-2 Temporary sound barriers capable of achieving a sound attenuation of at least 5 dBA shall be erected along the Project's north, west, and south-facing boundaries.

Cumulative Construction Noise Impacts

Construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. Two such developments have been identified: An apartment project located at 17030 Sunset Boulevard and a condominium project located at 17331 Tramonto Drive.

However, neither of these projects has the potential to result in cumulative construction noise impacts at Project receptors because of their distance from sensitive receptors that could be affected by all potential construction sites. First, the apartment project at 17030 Sunset Boulevard is located approximately 500 feet east of Westside Waldorf School and at a substantially higher elevation atop a nearby hillside. Numerous terrain and manmade features separate their two locations. As a result, it is unlikely that noises from this development would be audible at Westside Waldorf School at all. And though the development is approximately 380 feet from Edgewater Towers Condominiums, it is located to the east of this receptor, opposite the Project. Whereas the Project's construction noises would primarily impact west-facing residences at this receptor, this related development would impact primarily its east-facing residences. Therefore, it is unlikely that any residence at this receptor would experience considerable levels of construction noise from each of these projects simultaneously. And in any circumstance, construction of this development would be unlikely to increase noise levels at Edgewater Towers Condominiums by more than a marginal degree given its distance from the receptor.

With regard to the second related project located at 17331 Tramonto Drive, this project is

currently under construction and is likely to be completed or at least in an advanced stage of construction by the time that construction of the proposed Project would commence. Noise from late-stage construction activities such as interior work or coatings would not have the potential to result in significant noise impacts at nearby receptors.

Given these considerations, the Project's potential to result in significant cumulative noise impacts at nearby sensitive receptors would be considered less than significant.

Impact After Mitigation

The implementation of **Mitigation Measures MM-Noise-1** and **MM-Noise-2** would reduce the Project's construction source noise levels to below LAMC Section 112.05's noise limit of 75 dBA at 50 feet of distance. Equipping compatible construction vehicles with manufacturer-recommended or aftermarket mufflers could reduce source noise levels by 3 dBA, conservatively. The temporary sound barriers required by **MM-Noise-2** would further ensure that the Project's construction noise levels at 50 feet would not exceed 75 dBA. It should be noted that a barrier along the Project's eastern boundary would be unnecessary. The bluffs to the Project's east would ensure that noise levels 50 feet to the Project's east would be below 75 dBA, as the bluffs are approximately 50 feet high, much taller than any noise barrier. They would provide far superior attenuation than any noise barrier could realistically provide. After the implementation of **Mitigation Measures MM-Noise-1** and **MM-Noise-2**, the Project's construction noise impact would not expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, and the impact would be considered less than significant.

Operational Phase Noise Impacts

Regulated Noise Sources

During long-term project operations, the development would produce noise from both on- and off-site sources. LAMC Section 112.02 would regulate noise from mechanical sources such as heating, air conditioning, and ventilation systems. Section 112.01 would regulate any noise from amplified sources, for example light ambient music played in outdoor patio areas. However, Project plans do not include any outdoor restaurant or retail areas, so it is unlikely that the Project's uses would generate any amplified noises.

Compliance with these regulations would ensure that the Project's on-site operational noise sources would not generate noise levels in excess of standards established by any noise ordinance or other set of regulations. Impacts would be considered less than significant.

On-Site Noise Sources

During Project operations, the development would produce noise from both on- and off-site sources. The direct on-site sources would include the following:

Mechanical Equipment. Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this

regulation, high ambient noise levels in the Project's vicinity, distances to receptors, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA.

Residential Land Use. Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to different degrees. The City's noise ordinance would provide a means to address nuisances related to intrusive residential noises.

Retail Land Uses. The Project would contain 2,900 square feet of ground-floor retail space. However, because no outdoor dining is proposed, it is unlikely that noise from these uses would be audible at any nearby receptors, let alone potentially significant.

Auto-Related Activities. The Project would provide 49 parking spaces located in one level of below-grade parking and two levels of at- and above-grade parking. All parking areas would be screened and internal. As a result, intermittent noise events such as door slamming or vehicle engine start-ups would likely be inaudible, or at the very least considerably attenuated, at nearby receptors. The Project's on-site auto-related activities would not be capable of substantially elevating ambient noise levels at off-site receptors, especially given the location's existing high levels of noise related to transportation sources.

The impact potential of these on-site operational noise sources would be considered less than significant.

Off-Site Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily trips. On a typical weekday, the Project is forecast to generate an estimated 514 net new daily trips, including 34 A.M. peak hour trips and 44 P.M. peak hour trips.¹⁷⁴ The noise impact of these vehicle trips was modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels along inputted roadway segments. For this analysis, an existing year (2017) no project scenario was compared to an existing year with project scenario.

As shown in **Table B.13-6**, Project-related traffic would, individually, have a negligible impact on roadside ambient noise levels in the Project's vicinity. This impact would be considered less than significant.

Table B.13-6
Existing Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, Leq 1hr			
		No Project (2017)	With Project (2020)	Project Change	Significant Impact?
N/B Sunset Blvd., N of Castellammare Dr.	AM	68.4	68.4	< 0.1	No
	PM	67.7	67.7	< 0.1	No

¹⁷⁴ Overland Traffic Consultants, Inc.; Traffic Impact Analysis for 17346 Sunset Mixed-Use Project; April 2018.

Table B.13-6
Existing Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, Leq 1hr			
		No Project (2017)	With Project (2020)	Project Change	Significant Impact?
S/B Sunset Blvd., N of Castellammare Dr.	AM	67.6	67.6	< 0.1	No
	PM	68.0	68.0	< 0.1	No
E/B Sunset Blvd., E of Marquez Ave	AM	67.2	67.2	< 0.1	No
	PM	67.8	67.8	< 0.1	No
W/B Sunset Blvd, E of Marquez Ave.	AM	65.0	65.0	< 0.1	No
	PM	66.7	66.7	< 0.1	No
Source: DKA Planning, 2018.					

The majority of the Project's long-term noise impacts would come from traffic traveling to and from the Project. 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 individual contribution to permanent off-site ambient noise level increases would be minimal.

As shown in **Table B.13-7**, with or without the addition of Project traffic, future roadside peak hour ambient noise levels would not substantially increase. CNEL noise levels in the Project's vicinity would likewise not increase by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. The Project's cumulative operational noise impact would therefore be considered less than significant.

Table B.13-7
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, Leq 1hr				
		Existing (2017)	No Project (2020)	With Project (2020)	Project Change	Significant Impact?
N/B Sunset Blvd., N of Castellammare Dr.	AM	68.4	68.5	68.6	0.2	No
	PM	67.7	67.8	67.9	0.2	No
S/B Sunset Blvd., N of Castellammare Dr.	AM	67.6	67.8	67.8	0.2	No
	PM	68.0	68.1	68.2	0.2	No
E/B Sunset Blvd., E of Marquez Ave.	AM	67.2	67.4	67.5	0.3	No
	PM	67.8	68.1	68.1	0.3	No
W/B Sunset Blvd, E of Marquez Ave.	AM	65.0	65.2	65.2	0.2	No
	PM	66.7	67.0	67.0	0.3	No
Source: DKA Planning, 2018.						

b) 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, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

Peak particle velocity (PPV) is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.¹⁷⁵

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 can affect concentration or disturb sleep. Ground-borne vibrations can also interfere with certain types of highly sensitive equipment or machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.¹⁷⁶ Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Settings

Federal

For the evaluation of construction-related vibration impacts, state standards set by the California Department of Transportation (Caltrans) are used given the absence of Federal, County, and City standards specific to construction activities.

State

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. The Caltrans manual also cites

¹⁷⁵ Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.

¹⁷⁶ Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.

additional criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

Table B.13-8 summarizes Caltran’s vibration guidelines for building and structural damage.

**Table B.13-8
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
Source: California Department of Transportation, 2013.		

Construction Vibration Impacts

As shown in **Table B.13-3**, construction of the Project would require equipment such as excavators, loaders, auger drill rigs, and haul trucks. **Table B.13-9** shows the distances at which groundborne vibration generated by these vehicles could exceed various Caltrans vibration criteria. No nearby structure would experience groundborne vibration in excess of its respective Caltrans criteria as a result of the Project’s construction activities. The Project’s groundborne vibration impact from construction would be considered **less than significant**.

**Table B.13-9
Building Damage Vibration Levels at Off-Site Structures - Unmitigated**

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
Commercial Strip Mall – 17332-17340 Sunset Blvd.	8	0.278	0.5	No
Edgewater Towers Condominiums – 17352 Sunset Blvd.	80	0.028	0.5	No
Palisades Electric – 17374 Sunset Blvd.	80	0.028	0.5	No
Commercial Building – 17351 Sunset Blvd.	120	0.019	0.5	No
Source: DKA Planning 2018.				

Operational Vibration Impacts

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Minimal levels of operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibrations far below levels associated with human annoyance or land-use disruption. As a result, the Project's long-term vibration impacts would be considered less than significant.

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

No Impact.

The Project is not located within the vicinity of a private airstrip nor a public airport. The Project is located more than two miles northwest of Santa Monica Municipal Airport, and it is not located within that airport's Influence Area.¹⁷⁷ This zone includes the extent of an airport's 65 dB CNEL noise contour and represents the geographic area in which the public could be exposed to elevated noise levels as a result of the airport's arriving and departing flight paths. As the Project lies outside of this contour, it would not expose workers or residents to such elevated noise levels from aircraft. Therefore, no impact would occur.

¹⁷⁷ www.planning.lacounty.gov/aluc/airports.

XIV. Population and Housing

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

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact.

The Project Site is located in SCAG's City of Los Angeles Subregion. In 2020, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,063,757 persons¹⁷⁸, an increase of 81,846 persons compared to 2017 baseline year. According to SCAG's State-approved 2014 RHNA, the City of Los Angeles is in need of 82,002 housing units, an annual average of about 10,250 new dwelling units per year, for eight years. **Table B.14-1 Population, Households, and Employment in the City of Los Angeles**, includes the 2017 (baseline) and 2020 (buildout year) population¹⁷⁹, households¹⁸⁰, and employment¹⁸¹ values from SCAG's 2016-2040 RTP/SCS.

**Table B.14-1
Population and Households in the City of Los Angeles**

Year	Population	Households	Persons/Household
2017	3,981,911	1,390,645	1,780,710
2020	4,063,757	1,429,732	1,831,356
Projected Growth	+81,846	+39,087	+50,646
Population, housing, and employment calculated based on linear interpolation of 2017 and 2020 values.			

¹⁷⁸ Based on linear interpolation of 2012-2040 data.

¹⁷⁹ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Population between 2012 (3,845,500) and 2040 (4,609,400) is projected to grow by 763,900 over the 28-year period, or 27,282 per year average.

¹⁸⁰ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Households between 2012 (1,325,500) and 2040 (1,690,300) is projected to grow by 364,800 over the 28-year period, or 13,029 per year average.

¹⁸¹ The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012 for the baseline and buildout years. Employment between 2012 (1,696,300) and 2040 (2,169,100) is projected to grow by 472,700 over the 28-year period, or 16,882 per year average.

**Table B.14-1
Population and Households in the City of Los Angeles**

Based on the adopted 2016-2040 Regional Transportation Plan by SCAG:
<http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf>.
 Table: CAJA Environmental Services, March 2019.

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 B.14-2** and employee generation is shown in **Table B.14-2**. It is estimated that the Project would have approximately 97 residents and 8 new employees. This is a conservative estimate as it does not take into account the residential bedroom mix. This analysis is conservative and does not take into account the removal of any existing uses.

**Table B.14-2
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
Residential	40 DU	2.43 person / DU	97
Proposed Population			97
Note: DU = dwelling unit Source: The source for the 2.43 persons-per-household rate for the City is the American Community Survey, 5-year (2012-2016) Average Estimates. Table: CAJA Environnemental Services, October 2018.			

**Table B.14-3
Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees
Retail	2,900 sf	1 employee / 369 sf	8
Proposed Employees			8

Table B.14-3
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Note: sf = square feet Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11. Table: CAJA Environmental Services, October 2018.			

The Project would not create a unique use which would compel substantial new workers to the area to fill the demand created by the Project. Rather the jobs would most likely be filled by workers already living within the Los Angeles area since there is a sufficient unemployed workforce in the area to fill that demand. The August 2018 unemployment rate in the Los Angeles-Long Beach-Glendale area is approximately 5.1 percent.¹⁸² Thus, there is still potential for local residents to fulfill the demand for jobs that this Project would generate.”

The Project would not conflict with SCAG’s projections for the City of Los Angeles, or represent a significant population or housing increase as compared to existing levels. The Project would be 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, the Project does not represent a substantial or significant growth as compared to the existing characteristics. The potential to induce substantial growth may be indicated by the introduction of a project in an undeveloped area or the extension of major infrastructure.¹⁸³ The Project does not include introduction of development in an undeveloped area or the extension of major infrastructure (such as roadways, bridges, infrastructure). Moreover, the Project will provide residential units of varying sizes and price levels, including housing for very low income households, in the Los Angeles where there is high demand for housing and will create job opportunities which, as discussed above, would be filled with local residents. Accordingly, the Project would result in a less than significant impact to population and housing.

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.¹⁸⁴ The Housing Element provides the Regional Housing Needs Assessment (RHNA) allocation, which is the number of housing units that each community must plan for and accommodate during the 8-year period. 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

¹⁸² Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.

¹⁸³ LA City CEQA Thresholds Guide, page J.1-3.

¹⁸⁴ City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>.

for increased height or density.¹⁸⁵

The Project will 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 2013-2021.¹⁸⁶ The Housing Element has identified 64 sites in the Community Plan area as having housing capacity for 1,211 net units.¹⁸⁷ The Project Site does not currently provide housing. The Project, which is adding 40 housing units, will not result in a net loss of housing inventory in the area.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles. Therefore, the Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant.

Infrastructure Impacts

The Project Site is located within an urbanized area. There is adequate infrastructure such as roads and utilities in the Project vicinity. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by existing infrastructure such as roadways. Impacts would be less than significant.

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

No Impact.

The Project Site does not contain any housing and, therefore, will not be displacing any existing people or housing necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

¹⁸⁵ City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>.

¹⁸⁶ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

¹⁸⁷ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.

XV. Public Services

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES					
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
a.	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The section is based, in part, on the following items, included as **Appendix H** of this MND:

H-1 Fire Response, Los Angeles Fire Department, March 20, 2019.

H-2 Police Response, Los Angeles Police Department, March 5, 2018.

H-3 Schools Response, Los Angeles Unified School District, January 23, 2018.

H-4 Parks Response, Los Angeles Department of Recreation and Parks, January 26, 2018.

H-5 Libraries Response, Los Angeles Public Library, September 14, 2018.

a) 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. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.¹⁸⁸

Regulations

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. The Fire Prevention and Protection Chapter (Chapter V, Article 7) of the LAMC, known as the Los Angeles Fire Code, sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires and life safety hazards, the elimination of fire and life safety hazards in any building or structure (including buildings under construction), the maintenance of fire protection

¹⁸⁸ http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

equipment and systems, and the storage, use, and handling of hazardous materials.¹⁸⁹

Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed under permit of the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project will comply with these requirements of the Fire Code, as applicable.

The LAMC addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in Section 57.507.3.1 of the LAMC, fire water flow requirements vary from 2,000 gallons per minute (gpm) in the Low Density Residential land use category to 12,000 gpm in the High Density Industrial and Commercial land use category, as shown in **Table B.15-1**. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the High Density Residential and Neighborhood Commercial category require 4,000 gallons per minute from four adjacent fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project will install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in Section 57.507.3.2 of the LAMC. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Section 57.512.1 of the LAMC provides that response distances, which are based on land use and fire flow requirements, shall comply with Table 57.507.3.3 of the LAMC. Based on such requirements, the maximum response distance for the Residential and Commercial land use category from fire stations with an engine company is 1.5 mile, and the maximum response distance from fire stations with a truck company is 2 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. In addition, as a skyscraper project, the structure is required to be equipped with sprinklers regardless of distance.

¹⁸⁹ Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

Table B.15-1
LAFD Fire Flow and Response Distance Requirements

Type of Land Development	Fire Flow	Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
High Density Residential and Neighborhood Commercial	4,000 gpm from four adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously	1 mile	1.5 miles
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required).	0.75 mile	1 mile
Notes: gpm = gallons per minute Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles. The maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied. Source: Los Angeles Fire Code, Table 57.507.3.3,			

Existing Stations

Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between commercial land use and a LAFD station that houses an engine company¹⁹⁰ is 1.0 mile and a station that houses a truck company¹⁹¹ is 1.5 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.¹⁹² The Project Site is served by several fire stations, as shown in **Table B.15-2, Fire Stations**.

Table B.15-2
Fire Stations

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
23	17281 Sunset	700 feet	Assessment Engine Paramedic Ambulance Brush Patrol	EMS: 5:46 min Non-EMS: 6:03 min.	EMS: 565 Non-EMS: 153
69	15045 Sunset	2.8 miles	Assessment Light Force Paramedic Ambulance Rescue Ambulance	EMS: 5:19 min Non-EMS: 5:41 min.	EMS: 865 Non-EMS: 362

¹⁹⁰ 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>.

¹⁹¹ LAFD: Aerial Ladder Fire Engines: <http://lafd.org/about/apparatus>.

¹⁹² http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

**Table B.15-2
Fire Stations**

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
<p>Incident counts: year 2017 (Jan to Nov). Non-EMS is fire emergency. EMS is emergency medical service.</p> <p>Response Time: year 2017 (Jan to Nov) average time (turnout time + travel time) in the station area.</p> <p>Response time listed above does not include call processing, which averages 1:03 minutes citywide in 2017. Call processing is done at a central location and does not differ by fire stations.</p> <p>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 EMS unit is dispatched.</p> <p>Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their personal protective equipment 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.</p> <p>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.</p> <p>Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.</p> <p>http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf</p> <p>Task Force: Truck company and two fire engines.</p> <p>LAFD April 2016 Fire Station Directory.</p> <p>Table: CAJA Environmental Services, January 2018.</p>					

Response Distance

There is a station with an engine and truck (Light Force)¹⁹³ within 3 miles. The Project will be constructed with fire protection as required by the LAFD Chief or applicable building and safety codes, 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 will comply with the LAFD Code for fire protection and suppression requirements. The Project will have a full fire sprinkler system.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the

¹⁹³ A Truck Company runs with a single Engine in a configuration called a "Light Force." Or, when running with two engines, the term "Task Force" is used.

court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.¹⁹⁴

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Sunset). The routes from the fire stations to the Project Site would likely pass through several of the study intersections. The future traffic conditions with the Project show that none of the study intersections would have a significant impact.¹⁹⁵ 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.¹⁹⁶ The following fire hydrants are near the Site:¹⁹⁷

- Hydrant (ID 42786, size 2½ x 4D, 8-inch main) on west side of Sunset, across the street.
- Hydrant (ID 42394, size 2½ x 4D, 6-inch main) on east side of Sunset, north of the Site.

Upgrades to the hydrants and system will be evaluated at the plan check phase. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then onsite or offsite upgrades to the existing infrastructure, as determined by the LADWP and LAFD shall be required to be made by the Applicant.

No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site. The Project will comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access. Those recommendations will 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. This allows the LAFD to ensure that the Project will not increase demand on the fire department to

¹⁹⁴ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal. App. 4th 833, 847.

¹⁹⁵ Traffic Impact Analysis, Overland Consulting April 2018.

¹⁹⁶ LAMC Sec. 57.09.06, Fire Flow: <https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter05.pdf>.

¹⁹⁷ Navigate LA, DWP (Fire Hydrants) Layer: <http://navigate.la.lacity.org/navigate/la/>

the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

ii) Police protection?

Less Than Significant Impact.

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.¹⁹⁸

The West Los Angeles Community Police Station, located at 1663 Butler Avenue, is approximately 7.5 miles driving distance from the Project Site. The boundaries of the Station are as follows: Mulholland Drive to the north; LA City/Beverly Hills City boundary to the east; LA City/Santa Monica City boundary to the south; and LA City/County land to the west.¹⁹⁹ The West Los Angeles Community has approximately 228,000 residents, and has approximate 260 sworn officers.²⁰⁰

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, percent of calls with additional 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 not relevant 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 B.15-3, 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.

¹⁹⁸ LAPD, West Bureau: http://www.lapdonline.org/west_bureau

¹⁹⁹ <http://assets.lapdonline.org/assets/pdf/westLAMap.pdf>

²⁰⁰ Police Response, Los Angeles Police Department, March 5, 2018.

**Table B.15-3
Crime Statistics**

Type of Crime	West LA	Citywide
Homicide	2	271
Rape	78	1,726
Robbery	210	10,386
Aggravated Assault	200	16,098
Burglary	1,116	15,610
Motor Vehicle Theft	479	18,245
Burglary Theft from Vehicle	1,514	30,920
Personal/Other Theft	1,506	30,720
Total (Part 1 Crimes)	5,105	123,976
Year-to-date: December 16, 2017. West Los Angeles: http://assets.lapdonline.org/assets/pdf/wlaprof.pdf Citywide: http://assets.lapdonline.org/assets/pdf/cityprof.pdf Table: CAJA Environmental Services, January 2018.		

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.

The Project Site is open and accessible. 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. Temporary construction fencing will 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. 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. Therefore, construction impacts on police protection services would be less than significant.

Operational Impacts

The Project would increase the number of people at the Site, as well as an increase in visitors, especially over the evening hours due to the mix of 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.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of

Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²⁰¹

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 be in a parking structure integrated into the building.

The LAPD will require that the commanding officer of the Station Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. The Project will not require the construction of a new or expanded police station. Therefore, impacts associated with police services to less than significant.

The LAPD provides data on residents and officers. It does not take into account employees, visitors, and guests. The current approximate ratio of residents to officers is approximately 877 residents to one officer.²⁰² The addition of the Project's 97 residents would equate to 0.1 officer.²⁰³ This represents approximately 0.04 percent increase compared to existing staffing levels. This change is not substantial. Moreover, the Project will contribute sales and property tax revenue into the City's General Fund, which can be used to fund additional resources in accordance with the planning and deployment strategies of the LAPD. The Project would not require the construction of a new or expanded police station. Project design features would reduce the impacts associated with police services to less than significant.

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:²⁰⁴

- Marquez Charter Elementary School (K-5), located 16821 Marquez Avenue.²⁰⁵

²⁰¹ *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847.

²⁰² $228,000 / 260 = 877$.

²⁰³ $97 / 877 = 0.10$ officers.

²⁰⁴ LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>.

- Paul Revere Middle School (6-8), located at 1450 Allenford Avenue.²⁰⁶
- Palisades Charter High School (9-12), located at 15777 Bowdoin Street.²⁰⁷

Enrollment Capacities

Each of the schools' enrollments and capacities are shown in **Table B.15-4**. There are no anticipated new schools planned for the area.

Proximity to Schools

The Project Site is in one-quarter mile of the following schools:²⁰⁸

- Palisades Jewish Early Childhood Center, 17315 Sunset, 360 feet northwest of the Site.
- Westside Waldorf School, 17310 Sunset, 390 feet northeast of the Site.

The schools are generally shielded from the Project Site by intervening residential and commercial buildings. 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.

Table B.15-4
LAUSD Schools Enrollments and Capacities

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ (Shortage) ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ (Shortage) ⁸	Overcrowding Future? ⁹
Marquez Charter Elementary	551	536	537	15	Yes	496	567	(80)	Yes
Revere Middle	2,213	1,212	2,166	1,001	No	2,058	1,166	892	No
Palisades Charter High	3,000	942	2,985	2,058	No	3,000	1,087	1,913	No
<p>Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2016-2017. Current and projected data are updated annually and become available after May 1st of each calendar.</p> <p>¹ 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.</p> <p>² 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 goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).</p> <p>³ The number of students actually attending the school now, including magnet students.</p>									

²⁰⁵ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=7740

²⁰⁶ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8481

²⁰⁷ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8886

²⁰⁸ LAUSD and Google Maps.

Table B.15-4
LAUSD Schools Enrollments and Capacities

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ (Shortage) ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ (Shortage) ⁸	Overcrowding Future? ⁹
⁴ Current seating overage or (shortage): equal to (current capacity) - (resident enrollment). ⁵ 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. ⁶ 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 capacity for magnet programs. ⁷ 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. ⁸ Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment). ⁹ 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. ^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. Source: Written response from Rena Perez, LAUSD, January 23, 2018. Included in the Appendices. Table by CAJA Environmental Services, February 2018.									

As shown on **Table B.15-5**, the Project would generate a total increase of approximately 19 students. To be conservative, this analysis assumed that all students generated by the Project will attend LAUSD schools and will be new to the district. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

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 would be less than significant.

Table B.15-5
Project Estimated Student Generation

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential units	40 units	9	3	5	17
Non-residential	2,900 sf	1	1	1	3
Total		10	4	6	19
<p>The generation factor is from the LAUSD, 2016 Developer Fee Justification Study, March 2017. Students per household: 0.2269 elementary, 0.0611 middle; 0.1296 high school. Students per 1,000 sf: 0.610 for neighborhood shopping centers. Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 54.3 percent for elementary, 14.6 percent for middle, and 31.0 percent for high school.</p> <p>Table: CAJA Environmental Services, October 2018.</p>					

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).

Table B.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.

Table B.15-6
Parks and Recreation Centers

Name	Address
Will Rogers State Beach	17600 PCH
Pacific Palisades Overlook Park	Palisades Drive and Sunset Blvd
Los Liones Canyon Trailhead	566 Los Liones Drive
<p>NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/navigatela/</p> <p>Table: CAJA Environmental Services, January 2018.</p>	

LAMC Section 19.17 provides for the payment of parks fees, depending on the nature of the development. According to LAMC Section 12.33 E, a non-subdivision-residential project with 50 or fewer units must pay a per-unit fee according to a schedule, which is updated yearly.

The Project would increase the number of residents and employees at the Project 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. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities. However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

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.²⁰⁹ 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 communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, 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 B.15-7 describes the libraries that would serve the Project. The Project would not directly necessitate the need for a new library 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. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

This analysis 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.^{210, 211, 212} Further, Measure L

²⁰⁹ LAPL website: <http://www.lapl.org/about-lapl/press/2012-library-facts>.

²¹⁰ "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>.

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 B.15-7
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Palisades Branch	861 Alma Real Drive	10,500	49,820 / 90,031	106,383	10
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
Staffing is full-time equivalent. Current Service – 2010 Census. 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. Table: CAJA Environmental Services, October 2018.					

²¹¹ "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

²¹² "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>.

XVI. Recreation

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. 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?	<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"/>

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

Less Than Significant Impact.

The Project would increase the number of residents and employees at the Project Site. Employees 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 Project Site are discussed under Section 15.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

XVII. Transportation and Traffic

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION					
Would the project:					
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based, in part, on the following items, included as **Appendix I** of this MND:

I-1 Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

I-2 Approval Letter, LADOT, May 10, 2018.

Would the project:

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

Less Than Significant Impact.

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.

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:

- (a) Existing Traffic counts (counts conducted on Wednesday November 15, 2017);
- (b) Traffic in (a) + the net Project traffic (Existing + Project);
- (c) Traffic in (b) + proposed traffic mitigation, if necessary
- (d) Existing + ambient growth to 2020 (added additional 1% per year ambient growth);
- (e) Traffic in (d) + Related Projects (future “Without Project” scenario);
- (f) Traffic in (e) with the proposed Project traffic (Future “with Project” scenario);

(g) Traffic in (f) + the proposed traffic mitigation, if necessary.

A LADOT Critical Movement Analysis (CMA) of the existing and future traffic conditions has been completed at those locations expected to have the highest potential for significant traffic impacts. Morning and evening peak hour conditions have been evaluated at eight (8) key intersections. A memorandum of understanding (MOU) was prepared and approved by the City of Los Angeles to detail the parameters of the study.

The intersections analyzed in this study are:

1. Pacific Coast Highway and Topanga Canyon Boulevard;
2. Pacific Coast Highway and Sunset Boulevard;
3. Castellammare Drive and Sunset Boulevard;
4. Palisades Drive and Sunset Boulevard;
5. Marquez Avenue/Marquez Place and Sunset Boulevard;
6. Baylor Street/Marquez Avenue and Sunset Boulevard;
7. Sunset Boulevard and Temescal Canyon Road; and,
8. Pacific Coast Highway and Temescal Canyon Road.

Environmental Setting

The Project location is within 1,000 feet of Pacific Coast Highway which is State Highway 1. State Highway 1 is a north-south operating facility that operates at or near the Pacific coastline. While the roadway is considered a north-south route, it follows the coastline in the Project area and is essentially operating east-west locally. State Highway 1 is under the jurisdiction of the State of California Transportation Department (Caltrans). State Highway 1 carries approximately 63,000 vehicles per day (VPD) and 5,000 vehicles per hour (VPH).

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 Route 1 through the McClure Tunnel north of Santa Monica Boulevard. The I-10 freeway is located approximately 4.6 miles south of the Project Site and carries approximately 149,000 VPD with 11,400 VPH near the junction Pacific Coast Highway (State Highway 1) during the peak periods.

The **Ventura Freeway** (US-101) is a north-south freeway located north of the Project Site. The Ventura Freeway is accessible from the Project area via Topanga Canyon Boulevard (State Route 27) or the Santa Monica Freeway. The US-101 freeway is located approximately 13 miles northeast of the Project Site and carries approximately 228,000 VPD with 22,600 VPH Topanga Canyon Boulevard during the peak periods. The US-101 and I-10 freeways link to numerous other freeways in the vicinity providing extensive regional access.

Baylor Street is a north-south operating curvilinear road designated as a Local Street in the City of Los Angeles Mobility Plan 2035 (Mobility Plan). Baylor Street is a short street of approximately 700 feet connecting Sunset Boulevard (across from Marquez Avenue) and Las Casas Avenue. One lane in each direction is provided with parking permitted on both sides of the street.

Castellammare Drive is an east-west operating curvilinear road designated as a Local Street in the Mobility Plan. Castellammare Drive extends from Sunset Boulevard southwest of the Project site to Tramonto Drive. This roadway provides access to residential properties and additional local roadways. The roadway is narrow with parking generally not permitted.

Los Lions Drive is a generally northwest-southeast operating Collector Street in the Mobility Plan north of the Project site. One lane in each direction is provided. Los Lions Drive extends from Sunset Boulevard to a gated access way. Los Lions Drive provides access to several park access areas. Some parking is permitted throughout the day with restriction for no parking between 11 PM and 5 AM.

Marquez Avenue is a roadway designated as a Local Street in the Mobility Plan. Marquez Avenue intersects with Sunset Boulevard at two locations. The northeast location is at Baylor Street and the southwest location is at Marquez Place. Time limited metered parking is provided along both sides of Marquez Avenue northwest of Sunset Boulevard and Baylor Street to Bollinger Drive (northeast intersection) on the north side of the street and Edgar Street on the south side. Parking is available and not metered beyond this point. One lane in each direction is provided with additional lanes provided at some intersections.

Pacific Coast Highway is designated as a Boulevard II in the Mobility Plan. The roadway operates in the east-west direction in the immediate area but is generally considered a north-south roadway. For clarity purposes to the intersecting study roadways, Pacific Coast Highway is considered east-west in this report. Pacific Coast Highway is a State Highway (State Highway 1) and a Scenic Highway. Two to three lanes in each direction are provided. Some parking segments available along the roadway.

Palisades Drive is designated as an Avenue I in the Mobility Plan. Palisades Drive terminates to the south at Sunset Boulevard and travels northerly through the hills through primarily residential properties and roadways. Palisades Drive changes name to Chastain Parkway East at Piedra Morada Drive. Parking is permitted along some areas of Palisades Drive.

Sunset Boulevard provides the northwestern boundary of the Project site. Sunset Boulevard is designated as an Avenue I in the Mobility Plan. Sunset Boulevard is also designated as a Scenic Highway in the Project area. The roadway provides horizontal and vertical curves on its route to/from the coastline. Two lanes in each direction are provided in the Project area with a two-way left turn lane in front of the Project site to facilitate left turns in and out of the Project site and neighboring properties. Thirty-minute metered parking is providing along the Project frontage and in the immediate area. Sunset Boulevard is considered an east-west roadway where it intersects most of the study intersections. The exceptions are at Pacific Coast Highway and Castellammare Drive where it is considered north-south.

Temescal Canyon Road is a north-south operating roadway designated as an Avenue I in the Mobility Plan. Temescal Canyon runs from Sunset Boulevard to Pacific Coast Highway. The roadway provides access to multiple nature areas. Parking is generally permitted along the road. Two lanes and bike lanes are provided in each direction with a two-way left turn lane facilitating access to local venues and nature areas.

Project Traffic Generation

Traffic-generating characteristics of many land uses including the proposed residential apartments, restaurant²¹³ and retail has 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 Manual, 10th Edition. This publication of traffic generation data has become the industry standard for estimating traffic generation for different land uses. The ITE studies indicate that the use and the size associated with the Project generally exhibit the trip-making characteristics as shown by the trip rates in **Table B.17-1**.

Table B.17-1
Trip Generation Rates

Description	ITE Code	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Multi-family residential	220	7.32	0.46	23%	77%	0.56	63%	37%
Retail	820	37.75	0.94	62%	38%	3.81	48%	52%
High Turnover Restaurant	932	112.18	9.94	55%	45%	9.77	62%	38%
Source: <u>Traffic Impact Analysis</u> , Overland Traffic Consultants, April 2018. Table by CAJA Environmental Services, May 2018.								

The Project will provide a mix of uses. The patrons of the commercial components of the Project may live on site or visit more than one venue. For instance, a retail patron may stop for something to eat or a tenant may stop to buy something at the retail establishment. These dual-purpose trips are already on the site and are not new trips to the Project site. These are considered internal trips. A 5% internal trip reduction was incorporated in the analysis for the proposed restaurant and retail land uses. 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 that are published in their December 2016 Traffic Impact Study Guidelines. 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. A high turnover restaurant is permitted a 20% pass-by rate. However, in order to

²¹³ The Project is expected be all retail, but retail and restaurant split was used to provide a conservative analysis since restaurant trip rates are higher.

present a conservative analysis, only a 10% pass-by trip reduction was included in the analysis for the restaurant and retail components of the Project.

Previously, the Project Site was occupied by a fast-food restaurant with drive through services. The restaurant has been closed for more than two years. No prior use trip reduction credits were considered for this traffic analysis.

The commercial tenancy was estimated in the traffic report with half restaurant and half retail (1,500 square feet each) to provide flexibility in leasing.

After reduction for the 5% internal trip and 10% pass-by trip reduction for the commercial components of the Project, a net of 514 daily trips with 34 net trips during the AM peak hour and 44 net trips during the PM peak hour have been estimated to be created by the new Project. **Table B.17-2** displays the estimated Project trip generation.

Table B.17-2
Trip Generation Rates

ITE Code	Description	Size	Daily	AM Peak Hour			PM Peak Hour		
				Total	In	Out	Total	In	Out
220	Residential Apartment	44 units	322	20	5	15	25	16	9
932	Restaurant	1,500 sf	168	15	8	7	15	9	6
	Internal Trips	5%	(8)	(1)	(1)	0	(1)	(1)	0
	Pass-by Trips	10%	(16)	(1)	0	(1)	(1)	0	(1)
	Subtotal		144	13	7	6	13	8	5
820	Retail	1,500 sf	57	1	1	0	6	3	3
	Internal Trips	5%	(3)	0	0	0	0	0	0
	Pass-by Trips	10%	(6)	0	0	0	0	0	0
	Subtotal		48	1	1	0	6	3	3
Net Proposed Trips			514	34	13	21	44	27	17
For conservative purpose, the traffic study analyzed 44 units. The Project is expected be all retail, but a retail and restaurant split was used to provide a conservative analysis since restaurant trip rates are higher. Source: <u>Traffic Impact Analysis</u> , Overland Traffic Consultants, April 2018. Table by CAJA Environmental Services, May 2018.									

Methodology

Traffic volume data used in the following peak hour intersectional analysis were based on traffic counts conducted by National Data Systems (NDS), an independent traffic data collection company. Traffic counts were conducted on Wednesday November 15, 2017. This was a typical weekday when there were no holidays, no rain and schools were in session. Traffic counts were conducted from 7 AM to 10 AM during the morning peak and from 3 PM to 6 PM evening peak hours. These counts include vehicles, their turning movements, number of trucks, number of buses, school age pedestrians and all other pedestrians. The highest single hour during each of the peak periods was used in this analysis.

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 traffic movements in each direction 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's 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 B.17-3**.

Table B.17-3
Level of Service Definition

LOS	V/C	Operating Condition
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 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: Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

Table: CAJA Environmental Services, May 2018.

Some reductions for traffic signal improvements in the area are included in the analysis. The area currently has some 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 many of the signal systems in the City 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.

The intersections of Sunset Boulevard & Castellammare Drive and Palisades Drive & Sunset Boulevard incorporated a 7% reduction for the inclusion of the ATSAC system improvements.

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.

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 Traffic Impact Study Guidelines, December 2016, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in the **Table B.17-4**.

Table B.17-4
Significant Impact Criteria, City of Los Angeles

LOS	Final V/C	Increase in V/C
C	0.701 – 0.800	+ 0.040
D	0.801 – 0.800	+ 0.020
E and F	> 0.901	+ 0.010 or more
No significant impacts occur at LOS A or B because intersections operations are good and can accommodate additional traffic growth. Source: <u>Traffic Impact Analysis</u> , Overland Traffic Consultants, April 2018. Table: CAJA Environmental Services, May 2018.		

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 were exceeded. As noted in **Table B.17-5**, no significant traffic impacts are identified.

Table B.17-5
Traffic Conditions for Existing + Project

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	PCH and Topanga	AM	1.013	F	1.014	F	+ 0.001	No
		PM	0.920	E	0.922	E	+ 0.002	No
2	PCH and Sunset	AM	0.731	C	0.734	C	+ 0.003	No
		PM	0.855	D	0.860	D	+ 0.005	No
3	Castellammare and Sunset	AM	0.345	A	0.348	A	+ 0.003	No
		PM	0.432	A	0.435	A	+ 0.004	No
4	Palisades and Sunset	AM	0.430	A	0.432	A	+ 0.002	No
		PM	0.417	A	0.421	A	+ 0.004	No
5	Marquez and Sunset	AM	0.347	A	0.350	A	+ 0.003	No
		PM	0.488	A	0.492	A	+ 0.004	No
6	Marques/Baylor and Sunset	AM	0.365	A	0.366	A	+ 0.001	No
		PM	0.497	A	0.501	A	+ 0.004	No
7	Sunset and Temescal	AM	0.820	D	0.824	D	+ 0.004	No
		PM	0.684	B	0.689	B	+ 0.005	No
8	PCH and Temescal	AM	1.067	F	1.068	F	+ 0.001	No
		PM	0.969	E	0.973	E	+ 0.004	No

Source: Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

Table: CAJA Environmental Services, May 2018.

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. 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 Transportation²¹⁴ and City of Los Angeles Department of City Planning. 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 Related Projects are described in **Table B.17-6**.

To evaluate future traffic conditions with the Related Projects, estimates of their peak hour trips generated were developed. The potential net increase in traffic from the Related Projects is shown in Appendix G. 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.

²¹⁴ Data obtained for Related Projects during October 25, 2017.

**Table B.17-6
Related Projects**

No.	Project	Size	Location
1	Apartment	47 unit	17030 Sunset
2	Condominium	82 unit	17331 Tramonto
3	Commercial Village Redevelopment	58,280 sf	1035 Swarthmore
Source: <u>Traffic Impact Analysis</u> , Overland Traffic Consultants, April 2018. Table: CAJA Environmental Services, May 2018.			

The traffic conditions created by ambient traffic growth plus the other related development projects are shown in **Table B.17-7** 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.

Traffic conditions after completion of the Project have been calculated by adding the Project volume to the future without traffic volume. The traffic impact of the added project traffic at the study intersections is shown in **Table B.17-7** by comparing the future without Project and future with Project traffic conditions at the study intersections. The significant impact criteria provided in Table 6 was applied to the future traffic conditions. As shown in **Table B.17-7**, no significant traffic impacts occur at the study intersections. It should be noted that the impact analysis does not consider any changes to the existing intersection configuration (i.e., future roadway improvements).

This study has determined that using the criteria established by the City of Los Angeles Traffic Impact Study Guidelines, December 2016 and Pacific Palisades Specific Plan, that the added traffic volume generated by the Project will not significantly impact any of the eight study intersections.

LADOT Review and Approval

The Project will comply with the conditions contained within LADOT's Approval Letter for the Project, as it may be subsequently amended or modified.

**Table B.17-7
Traffic Conditions for Future + Project**

No.	Intersection	Peak Hour	Future		Future + Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	PCH and Topanga	AM	1.044	F	1.046	F	+ 0.002	No
		PM	0.949	E	0.952	E	+ 0.003	No
2	PCH and Sunset	AM	0.756	C	0.759	C	+ 0.003	No
		PM	0.888	D	0.892	D	+ 0.004	No
3	Castellammare and Sunset	AM	0.369	A	0.371	A	+ 0.002	No
		PM	0.456	A	0.460	A	+ 0.004	No

4	Palisades and Sunset	AM PM	0.449 0.446	A A	0.451 0.449	A A	+ 0.002 + 0.003	No No
5	Marquez and Sunset	AM PM	0.361 0.511	A A	0.363 0.515	A A	+ 0.002 + 0.004	No No
6	Marques/Baylor and Sunset	AM PM	0.380 0.520	A A	0.382 0.523	A A	+ 0.002 + 0.003	No No
7	Sunset and Temescal	AM PM	0.852 0.721	D C	0.857 0.727	D C	+ 0.005 + 0.006	No No
8	PCH and Temescal	AM PM	1.100 1.006	F F	1.101 1.009	F F	+ 0.001 + 0.003	No No

Source: Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

Table: CAJA Environmental Services, May 2018.

Public Transit Services

Metro Route 2/302 operates along Sunset Boulevard in the Project area with stops in Pacific Palisades, Westwood (including UCLA), West Hollywood, Hollywood, and into downtown Los Angeles. There are transfer opportunities to several bus and metro stations along the way. There is a bus stop at Sunset Boulevard and Castellammare Drive approximately 230 feet from the Project site.

The City of Santa Monica operates BBB9 along Sunset Boulevard in the Project area. Route BBB9 operates between Santa Monica High School, Will Rogers State Beach, Palisades High School and terminates at Sunset Boulevard and Marquez Avenue/Marquez Place. There is a bus stop at Sunset Boulevard and Marquez Avenue/Marquez Place approximately one mile from the Project site.

Metro Route 534 operates along Pacific Coast Highway in the Project area. The line initiates in the City of Santa Monica and continues to Trancas Canyon Road near Zuma County Beach. There is a bus stop at Pacific Coast Highway and Sunset Boulevard approximately 930 feet from the Project site.

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 displayed below in **Table B.17-8**.

Table B.17-8
Transit Trips

	Daily	AM Peak Hour	PM Peak Hour
Project Trips	514	34	44
Person Trips (x 1.4)	720	49	63
Transit Trips (x 3.5%)	25	2	2
Source: Traffic Impact Analysis, Overland Traffic Consultants, April 2018.			
Table: CAJA Environmental Services, May 2018.			

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. Therefore, no impacts would occur.

Bicycle Services

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. The plan entails roadways be improved with bike detectors at actuated signals. Temescal Canyon Road is identified as a Tier 2 Bicycle Lane. There is an existing bicycle lane Temescal Canyon Road. Pacific Coast Highway is identified as part of the Bicycle Enhanced Network with an existing Bicycle Path. In the 2010 Bicycle Plans, Temescal Canyon Road is identified as designated for a bicycle lane and part of the Neighborhood Bikeway Network. Pacific Coast Highway, in the Project area is defined as part of the Green Bikeway Network. There is an existing bicycle lane on Temescal Canyon Road between Sunset Boulevard and Pacific Coast Highway and a bicycle path off of Pacific Coast Highway along the coast line between Temescal Canyon Road to the City of Santa Monica and beyond to Venice Beach. The Project will not deter these plans. Therefore, no impacts would occur.

Pedestrian Facilities

The sidewalk along Sunset would remain. The crosswalks in the area along Sunset and Castellammare Drive would not be affected by the Project. Therefore, no impacts would occur.

The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

- b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ²¹⁵**

No Impact.

The Los Angeles County Congestion Management Program (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.

²¹⁵ While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

The intersection of Pacific Coast Highway and Sunset Boulevard is the nearest CMP intersection. This CMP intersection is approximately 930 feet from the Project. This intersection is one of the intersections evaluated in this report. Based on the traffic volumes presented in Figure 6, Project Traffic Volumes Only, 22 AM Peak Hour trips and 39 PM Peak Hour trips will be traveling through this intersection. This is below the 50 trip threshold for a potential CMP intersection impact. **Table B.17-7** presents a 0.4% and 0.3% impact for the AM and PM Peak Hours. Neither 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 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 5 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. Therefore, no impact would occur.

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

Less Than Significant with Mitigation Incorporated.

Construction

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.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. The Project will ensure that sight distance at the project access shall comply with standard City of Los Angeles sight distance standards.

The Project shall comply with LAMC Section 62.45 (Materials or Equipment in Streets – Permits, Regulations, Fees) and LAMC Section 91.3306 (Protection of Pedestrians). This will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles.

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. The Project developer will attempt to park and stage for construction on-site as much as possible. During periods of time where off-site street surfaces are needed, such as during garage excavation, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. In addition, the City of Los Angeles will require a Truck Haul Route program for approval by LADOT. Any off-site construction needs will be minimized and conducted outside of

peak traffic times. Deliveries of construction material will be coordinated to non-peak travel periods, to the extent possible. Construction worker vehicles that can not be accommodated on site will be encouraged to use public transit services or park along the site frontage. The Applicant will create a Construction Traffic Management Plan as part of **Mitigation Measure MM-Transportation-1**.

Temporary impacts to pedestrian safety could occur during construction as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. In order to reduce potential conflicts between pedestrians, bicyclists and construction vehicles, the Project would comply with **Mitigation Measure MM-Transportation-2** to ensure the safety of pedestrians, bicyclists, and drivers. Therefore, construction impacts would be less than significance.

Operation

Pedestrian access to the Project would be provided at entrances along Sunset Boulevard, as well as from the parking structures within the building. Parking would be accessed from one two-way driveway at the southern boundary of the Site to Sunset Boulevard, controlled with a stop-sign. The Project's operation would not mix pedestrian and automobile traffic. Therefore, no operation impact would occur.

Mitigation Measures

MM-Transportation-1 Construction Traffic Management Plan

- A Construction Traffic Management Plan shall be submitted to LADOT for review and approval.
- The bulk of the work will be conducted on site. However, if temporary lane closures were needed, it would require Street Services approval.
- Existing access for the site shall be maintained for construction access.
- Deliveries of construction material shall be coordinated to non-peak travel periods, to the extent possible.

MM-Transportation-2 Safety Hazards

- The Applicant shall install appropriate construction related traffic signs around the Project Site to ensure pedestrian and vehicle safety.
- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding) from

work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- The Applicant shall keep sidewalks open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalks shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

d) 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 or adjacent uses. The Project will not result in inadequate emergency access to the Project Site or surrounding area because no intersections would be significantly impacted due to the Project. Access, including driveway widths and aisles would comply with LAMC and Fire Code access requirements. Therefore, impacts would be less than significant.

XVIII. Tribal Cultural Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.					
a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The section is based, in part, on the following item, included as **Appendix J** of this MND:

J Tribal Cultural Resources Assessment, SWCA, April 2019.

Would the project:

- a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
 - i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

Less Than Significant Impact.

There are no historic buildings on the Project Site.²¹⁶ Therefore, impacts would be less than significant.

- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1,**

²¹⁶ <http://navigatela.lacity.org/navigatela/> and <http://historicplacesla.org/map>

the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact 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.

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.

On August 27, 2018, the results of a Sacred Lands File (SLF) search were received from the NAHC. The NAHC results letter indicated that there are no sacred sites in the SLF documented within the project site. The letter notes that the SLF and California Historical Resources Information System (CHRIS) are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of 16 Native American contacts and suggested contacting them to provide information on sacred lands that may not be

listed in the SLF. Eight of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as part of compliance with AB 52 (PRC Section 21082.3).

As lead agency, the City mailed letters on February 21, 2018, to the Native American tribes identified by the NAHC and included on the City's AB 52 notification list, pursuant to PRC Section 21082.3. One response was received on March 5, 2018, from the Gabrieleño Band of Mission Indians–Kizh Nation, who requested that they be consulted before the Project proceeded.

The City acknowledged the request and initiated consultation after March 5, 2018. The City and Tribe corresponded through phone conference and email, during which time the Tribe submitted additional documents to support their concern about the Project area being sensitive. The consultation was completed on January 4, 2019 with a letter sent by the City, summarizing the findings. First, after acting in good faith and after reasonable effort, mutual agreement could not be reached between the City and the Tribe for purposes of AB 52. Second, the City found substantial evidence existed to support a conclusion that the Project may cause a significant impact on tribal cultural resources, for which mitigation measures and a Condition of Approval for inadvertent discovery were created and attached to the letter. Third, the City found that the mitigation measures would mitigate potential significant impacts.

A CHRIS and SLF search revealed that no known tribal cultural resources are present within the Project Site. SWCA assessed the sensitivity for the Project Site to contain unidentified tribal cultural resources and determined it to be moderate. The City submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. The Gabrielino Band of Mission Indians–Kizh Nation responded and requested formal consultation. The response letter, subsequent correspondences, and consultation include no discussion of specific known tribal cultural resources being present within the Project Site. Excavation proposed for the Project involves complete excavation of native soils underlying the artificial fill. The deepest level of excavation proposed is estimated to be 12 m (40 feet) in the eastern portions of the project site, where existing artificial fill was observed to a maximum depth of 0.9 m (3 feet) below grade.

The likelihood for encountering unidentified tribal cultural resources exists only within the colluvial sediments situated between the artificial fill and bedrock. The potential for unidentified tribal cultural resources within the Project Site was determined by SWCA to be moderate. Specifically, material remains from a Native American camp may be present in the Project Site which would have cultural value to a California Native American tribe. If present, the Site could help answer important research questions. It would also be considered eligible for listing in the California Register of Historic Resources (CRHR) under Criteria 4, and therefore meet the definition of a tribal cultural resource under CEQA.

The Project is subject to the City's standard condition of approval for Tribal Cultural Resources Inadvertent Discovery, which provides a protocol in the event of a discovery during construction.

However, considering that the Project site has not been previously inspected for the presence of the resource below the surface, the moderate sensitivity for the presence of the resource, the

subtle nature of the features and objects potentially present, and the fact that such a resource could qualify for the CRHR, **Mitigation Measure MM-Tribal-1** is provide below to ensure that any such resources are properly identified and preserved. Implementation of this measure would reduce potentially significant impacts to tribal cultural resources to a less-than-significant level.

Condition of Approval

Inadvertent discovery of tribal cultural resources: In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290. If the City determines, pursuant to PRC Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the project permittee and the City regarding the monitoring of future ground-disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- 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) at California State University, Fullerton.

Inadvertent discovery of Human Remains: In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- 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)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD 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.
- If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

Mitigation Measure

MM-Tribal-1

Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrieleño Band of Mission Indians–Kizh Nation. Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources (“OHR”).

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. 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) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

XIX. Utilities and Service Systems

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS					
Would the project:					
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The section is based, in part, on the following items, included as **Appendix K** of this MND:

K-1 Wastewater Response, Los Angeles Bureau of Sanitation, January 19, 2018.

K-2 Water and Power Response, Los Angeles Department of Water and Power, March 16, 2018.

K-3 Natural Gas Response, Southern California Gas Company, April 17, 2018.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

The Project shall implement all applicable mandatory measures of the:

- 2016 California Plumbing Code, effective January 1, 2017;

- 2016 California Green Building Code (CALGreen), effective Jan. 1, 2017;
- 2017 Los Angeles Plumbing Code, effective January 1, 2017;
- 2017 Los Angeles Green Building Code, effective January 1, 2017;
- State Senate Bill SB 407, effective January 1, 2014;
- City of Los Angeles Ordinance No. 184,248 (titled, Green Building Codes Revision, Greywater Systems, Water Conservation Measures), effective June 6, 2016;
- City of Los Angeles Ordinance No. 180,822 (titled, Water Efficiency Requirements), effective December 1, 2009 and October 1, 2010; and
- City of Los Angeles Ordinance No. 172,075 (titled, Retrofit on Resale), effective 1988 and amended 1998.
- City of Los Angeles 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).
- City of Los Angeles Ordinance No. 181,899 (Low Impact Development) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

Wastewater

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)²¹⁷, which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,²¹⁸ and currently treats an average daily flow of approximately 362 mgd.²¹⁹ 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. Further, the HTP is a

²¹⁷ LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm.

²¹⁸ Los Angeles Sanitation: <http://www.lacitysan.org/irp/Wastewater.htm>.

²¹⁹ LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>.

public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's wastewater discharge would be typical for a mixed-use residential and commercial building and would not require any on-site treatment before flowing to the sewer.

As shown on **Table B.19-1, Project Estimated Wastewater Generation**, it is estimated the Project will generate a total of approximately 4,233 gallons per day (gpd) (or 0.042 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project. No credit is taken for existing uses. This is a worse-case, conservative approach.

**Table B.19-1
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Proposed New Uses			
Residential – Studio	8 units	75 gallons / unit	600
Residential – 1-bedroom	31 units	110 gallons / unit	3,410
Residential – 2-bedroom	1 units	150 gallons / unit	150
Retail	2,900 sf	25 gallons / 1,000 sf	73
Total Proposed			4,233
Note: sf = square feet; gpd = gallons per day Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf Wastewater Response, Los Angeles Bureau of Sanitation, January 19, 2018. Table: CAJA Environmental Services, October 2018.			

The Project Site is currently developed and adequately served by the existing wastewater conveyance system including:²²⁰

- 8-inch line on Sunset Boulevard, which feeds into a 24-inch line on PCH before discharging into the Sunset pump.

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building will be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers will be installed on-site as necessary to accommodate proposed flows.

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 will be required to build sewer lines to a point in the

²²⁰ Wastewater Response, Los Angeles Bureau of Sanitation, January 19, 2018.

sewer system with sufficient capacity. Construction of these connection lines would not cause a significant environmental effect. A final approval for sewer capacity and connection permit will be made at that time. If street closures for construction are required, the Project applicant will coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety. Therefore, Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system, which currently treats an average daily flow of approximately 362 mgd.²²¹ Thus, there is a remaining capacity of approximately 88 mgd. The increase in wastewater generation by the Project represents approximately 0.05% of the remaining capacity²²², and 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 would 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.

Water

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. The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.

As shown on **Table B.19-2, Project Estimated Water Consumption**, it is estimated the Project will consume a total of approximately 4,233 gallons per day (gpd) (or 0.042 mgd or 6 acre-feet per year²²³) of water. This total does not take any credit for the proposed sustainable and water conservation features of the Project. No credit is taken for existing uses. This is a worse-case, conservative approach.

²²¹ LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant: <http://www.lacitysan.org/wastewater/factsfigures.htm>.

²²² $0.042 \text{ mgd} / 88 \text{ mgd} \times 100\% = 0.05\%$.

²²³ 1 acre foot = 325,851.429 US gallons.

**Table 3.19-2
Project Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Proposed New Uses			
Residential – Studio	8 units	75 gallons / unit	600
Residential – 1-bedroom	31 units	110 gallons / unit	3,410
Residential – 2-bedroom	1 units	150 gallons / unit	150
Retail	2,900 sf	25 gallons / 1,000 sf	73
Total Proposed			4,233
Note: sf = square feet; gpd = gallons per day Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf <u>Wastewater Response</u> , Los Angeles Bureau of Sanitation, January 19, 2018. Table: CAJA Environmental Services, October 2018.			

There is an existing 12-inch clay pipe in Sunset.²²⁴ New on-site water mains and laterals will be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site. The LADWP's Water Service Organization (WSO) would be able to provide the domestic needs of the Project from the existing water system. The Project Applicant will 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 Service Availability Request (SAR). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project.

If the water infrastructure has insufficient capacity, then the Project Applicant will be required to build water lines to a point in the system with sufficient capacity. If street closures for construction are required, the Project applicant will coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety. Therefore, Project's impacts to the water conveyance system will be less than significant.

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 will be required to fund the required upgrades to

²²⁴ Water and Electricity Response, Los Angeles Department of Water and Power, February 2, 2018.

adequately serve the Project. Therefore, Project's impacts to the water conveyance system will be less than significant.

While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements. Section 57.507.3.1 of the LAMC establishes fire flow standards for specified land uses, including Low Density Residential, High Density Residential and Commercial Neighborhood, Industrial and Commercial, and High Density Industrial and Commercial or Industrial. Based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City. Additionally, as required by the LAMC, hydrants would be spaced per the hydrant spacing requirements set forth in Section 57.507.3.2 of the LAMC to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities.

Stormwater Drainage

As discussed in **Section B.10**, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site. The Project Site is located in an urbanized area of the City. The Project Site is currently primarily covered with a building and parking lot (hardscape). The Project will similarly occupy the entire Project Site with a new building, as well as paving and landscaping. 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. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project and the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

Electric Power

As discussed in **Section B.6**, above, LADWP has confirmed that electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds

available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Natural Gas

As discussed in **Section B.6**, above, there is sufficient natural gas supplies to serve the Project's natural gas demand. Accordingly, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded natural gas facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Telecommunications

The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. All on-site work would be within overall Project construction, which has been analyzed. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Impacts would be less than significant.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Less Than Significant Impact.

A significant impact may occur if a project 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 through the year 2040, per the 2015 LADWP Urban Water Management Plan (UWMP).

The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.²²⁵ The UWMP forecasts water demand by estimating baseline

²²⁵ 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

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 based on SCAG 2012 RTP.²²⁶ 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).²²⁷ Neither the UWMP 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. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

A 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. As previously discussed, the Project's generation of 0.042 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts would be less than significant.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Less Than Significant Impact.

A significant impact may occur if a project were to increase solid waste generation to a degree 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, 20 percent at the Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.²²⁸

Facilities

²²⁶ 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

²²⁷ SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

²²⁸ City of Los Angeles, Fact Sheet: Solid Waste Facilities:
http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf.

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).²²⁹ It is expected to close in 2037.²³⁰ 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.²³¹ 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).²³² 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.²³³ Therefore, the Sunshine Canyon 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.²³⁴ 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.²³⁵ 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.²³⁶ 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.

The Puente Hills Materials Recover Facility (MRF) accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes. The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.²³⁷ 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

²²⁹ 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.

²³⁰ 23 years remaining life as of 2014 Annual Report, prepared in December 2015.

²³¹ 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 November 19, 2016.

²³² Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, accessed November 19, 2016.

²³³ Sunshine Canyon: <http://www.sunshinecanyonlandfill.com/home/Future.html>, November 19, 2016.

²³⁴ 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.

²³⁵ 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.

²³⁶ Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.

²³⁷ LA County Sanitation Districts, PHMRF: <http://www.lacsd.org/solidwaste/swfacilities/mrts/phmrf/phmrfactsheet.asp>

Imperial County.²³⁸ The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.²³⁹

Construction

Construction of the Project will generate 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. Materials not recycled would be disposed of at local landfills.

Demolition will remove approximately 1,860 square feet of existing building, or 161 tons.²⁴⁰ Demolition would last approximately 2 weeks, with an average of 16 tons per day of demolition waste. Construction of the approximately 28,432 square feet of new floor area would generate approximately 62 tons of construction waste.²⁴¹ Construction would take approximately 12 months (not including demolition and grading portions). Therefore, Project construction would generate approximately 0.26 tons per day of construction waste on average throughout the construction phase.²⁴²

The Sunshine Canyon 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, construction impacts to landfills and solid waste services will be less than significant.

Operation

As shown on **Table B.17-3, Project Estimated Solid Waste Generation**, it is estimated the Project will generate a total of approximately 545 pounds per day (or 0.27 tons per day) of solid waste. No credit is taken for existing uses. This is a worse-case, conservative approach.

**Table B.17-3
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Proposed New Uses			
Residential	97 residents	4.7 pounds / resident	456

²³⁸ LA County Sanitation Districts, Waste-by-rail: <http://www.lacsd.org/solidwaste/wbr/default.asp>

²³⁹ Mesquite Regional Landfill, Site Information: <http://www.mrlf.org/index.php?pid=5>

²⁴⁰ Based on 173 pounds 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-4, page A-3).

²⁴¹ 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).

²⁴² 62 / 240 days = 0.26 tons per day.

**Table B.17-3
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Commercial	8 employees	11.1 pounds / employee	89
Total Proposed			545
http://www.calrecycle.ca.gov/LGcentral/GoalMeasure/DisposalRate/MostRecent/default.htm Table: CAJA Environmental Services, January 2018.			

The Sunshine Canyon Landfill has a remaining daily intake availability of 4,993 tpd and could therefore accommodate the additional approximately 0.27 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,²⁴³ with the goal to achieve a 90 percent diversion by 2025.²⁴⁴

In compliance with LAMC, 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.

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 Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

In compliance with the LAMC, 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.

Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact.

²⁴³ City of Los Angeles, Department of Public Works, Annual Report, 2013-14: <http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf>.

²⁴⁴ 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.

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 to accept the Project's waste through its slated to closure date of 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.

XX. WILDFIRE

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact.

At the time of permit review (plan check), the LAFD would review the Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards and would not approve permits unless emergency access meets their standards, thereby ensuring that the Project would not create any undue fire hazard.

Vehicular access to the Project would be provided via a driveway on Sunset Boulevard. Emergency access is also available on Sunset Boulevard. As such, emergency access to the Project Site and surrounding uses would be maintained at all times, as it is under current conditions. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Through compliance with applicable provisions of the Fire Code, Project impacts on emergency access is less than significant.

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

Less Than Significant Impact.

The LAFD currently serves the Project Site. The current slope on the Site will be leveled to provide a flat pad for the proposed building. No slope, prevailing wind, or other factors would exacerbate wildfire risks.

The Project Site is located in a Very High Fire Hazard Severity Zone²⁴⁵ and in a Fire Buffer Zone.²⁴⁶ However, the Project would comply with LAFD Brush Clearance Requirements.²⁴⁷ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the Project would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, impacts would be less than significant.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Less Than Significant Impact.

Hydrants, water lines, and water tanks would be installed per Fire Code requirements. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Automatic fire sprinkler systems are also required for the proposed land uses as part of the Project.

No unique infrastructure would be required for the Project related to wildland fire risk. Overall, the Project would not require the maintenance or installation of infrastructure that would exacerbate fire risks or that would result in impacts to the environment. As such, Project impacts would be less than significant.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Less Than Significant Impact.

The current slope on the Site will be leveled to provide a flat pad for the proposed building. This process would be done according to LADBS requirements to ensure the building on the top of the slope remains stable. Landscaping and building features would ensure that runoff complies with LID requirements. As discussed in **Section B.10**, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site. The Project Site is located in an urbanized area of the City. The Project Site is currently primarily covered with a building and

²⁴⁵ ZIMAS search: <http://zimas.lacity.org/>.

²⁴⁶ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

²⁴⁷ <http://www.lafd.org/fire-prevention/brush/clearance-requirements>

parking lot (hardscape). The Project will similarly occupy the entire Project Site with a new building, as well as paving and landscaping. 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. Therefore, impacts would be less than significant.

XXI. Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.					
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact.

A significant impact may occur 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. The Project Site is entirely covered with a building and parking structure. The Project would not impact any protected trees. The Project will have a less than significant impact on historic resources, archeological resources, paleontological resources, and human remains. As previously discussed in this MND, 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 would 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 or expected to have concurrent construction in the immediate area to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft 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 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 Traffic Impact Analysis provided a list of 3 Related Projects that are proposed to be developed in the area. The traffic study, air quality, and noise analyzes incorporate the mobile trips of these Related Projects. The nearest related project is a condominium development Related Project #2) at 17331 Tramanto Drive, approximately 375 feet away.

Each of these Related Projects would be subject to their own CEQA analysis 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 that ensure that any other localized impacts of the related project would not combine with the Project.

Aesthetics

For Project-level analysis, see Section B.1, of this MND. 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 are located in proximity to the Project Site such that their development would affect the aesthetic character of the Project Site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of Related Projects is expected to occur in accordance with adopted plans and regulations. Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture and Forestry Resources

For Project-level analysis, see Section B.2, of this MND. 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

For Project-level analysis, see Section B.3, of this MND.

AQMP Consistency

Cumulative development can affect implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG's 2016 RTP, implementation of the 2016 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 2016 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 the Air Quality section of this IS/MND, 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. 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. None of the Related Projects is close to the Project Site. 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

For Project-level analysis, see Section B.4, of this MND. 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

For Project-level analysis, see Section B.5, of this MND. 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 regulatory measures 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.

Energy

For Project-level analysis, see Section B.6, of this MND. 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 Projects would be required to be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each Related Projects 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. Finally, each Related Projects 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.

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.

Geology and Soils

For Project-level analysis, see Section B.7, of this MND. 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

For Project-level analysis, see Section B.8, of this MND. As climate change impacts are cumulative in nature, no typical single project can result in emissions of such a magnitude that it, in and of itself, would be significant on project basis. Therefore, the Project would result in less than significant cumulative impacts on global climate change.

Hazards and Hazardous Materials

For Project-level analysis, see Section B.9, of this MND. 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

For Project-level analysis, see Section B.10, of this MND. 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

For Project-level analysis, see Section B.11, of this MND. 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. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. The 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

For Project-level analysis, see Section B.12, of this MND. 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

For Project-level analysis, see Section B.13, of this MND. 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. The Related Projects are further away from the Project Site than the analyzed sensitive

receptors for noise and impacts were shown to be less than significant. Any construction noise, were it to occur concurrently with the Project, would be attenuated by the distance along Sunset Boulevard. 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 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.

None of the other Related Projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from the Related Projects, were it to occur concurrently with the Project, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from these sites to the nearby receptors.

Population and Housing

For Project-level analysis, see Section B.14, of this MND. The Related Projects would introduce additional residential, commercial, and office uses, and other related uses to the City of Los Angeles. Any residential Related Projects would result in direct population growth. The Project would not displace any residents. The Related Projects include 467 net new residential units, which generate approximately 1,312 residents. The Project adds 40 units and 97 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. The Project's population growth would not be cumulatively considerable. Therefore, the Project's cumulative impacts to population and housing would be less than significant. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts.

Public Services

For Project-level analysis, see Section B.15, of this MND. Given the geographic range of the Related Projects, they would be served by a variety of fire stations.²⁴⁸ 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

²⁴⁸ LAFD Fire Station Finder: http://www.lafd.org/fire_stations/find_your_station

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. Nevertheless, the development on any 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.

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. 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.

The Project, in combination with the Related Projects is expected to result in a cumulative increase in the demand for school services. These Related Projects would have the potential to generate students that would attend the same schools as the Project. 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.

Additional cumulative development would contribute to lowering the City's existing parkland to population ratio. However, each of the residential Related Projects is required to comply with the City's park mitigation fee ordinance. 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.

Given the geographic range of the Related Projects, they would be served by a variety of libraries.²⁴⁹ Development of the Related Projects would likely generate additional demands upon library services. 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

For Project-level analysis, see Section B.17, of this MND. 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 with Project analysis shows that there would be a less than significant impact to study intersections.²⁵⁰ Therefore, the Project's cumulative impact is considered less than significant.

Tribal Cultural Resources

For Project-level analysis, see Section B.18, of this MND. The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding tribal resources. This resource area is site and locally specific so that each related project would need to be evaluated within its own site-specific context. In addition, any related project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. All Related Projects will comply with the condition of approval for the inadvertent discovery of tribal resources and **MM-Tribal-1**. Cumulative impacts on tribal resource will be less than significant.

Utilities and Service Systems

For Project-level analysis, see Section B.19, of this MND. 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.

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. 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

²⁴⁹ LAPL Locations: <http://www.lapl.org/branches>

²⁵⁰ Traffic Impact Analysis, Overland Traffic Consultants, April 2018.

measures from the City that would also apply to the Related Projects in the City. In addition, some Related Projects could 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.

The HTP has adequate capacity (88 mgd). The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer months, respectively) to accommodate the cumulative total. The Sunshine Canyon landfill has adequate capacity (remaining daily intake availability of 4,993 tpd). The LADWP forecasts that in 2019-20, the total adjusted electricity sales (load forecast) will be 23,098 gigawatt-hours (gw-h) with residential uses consisting 8,166 gw-h and commercial uses consisting of 12,506 gw-h. The peak demand would be 5,707 megawatts (mw).²⁵¹ 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 (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. 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. The SCG retail core peak day demand in 2017 is estimated at 2,944 million cf/day and by 2022 is estimated at 2,849 million cf/day.²⁵²

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

²⁵¹ LADWP, 2016 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=12do6zwhm2_33&_afLoop=86387266209556

²⁵² <https://www.socalgas.com/regulatory/cgr.shtml>

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.

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.

Mitigated Negative Declaration

List of Preparers

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