City of Los Angeles
Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY
MITIGATED NEGATIVE DECLARATION
Westchester-Playa del Rey Community Plan Area

6711 Sepulveda Residential Project
ENV-2017-4078-MND
DIR-2017-4077-DB-WDI-SPR

Project Location: 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045

Council District: 11 – Mike Bonin

Project Description: The Proposed Project includes the demolition of an existing self-storage facility for the construction and development of an eight-story residential building with 180 dwelling units (18 studio units, 105 one-bedroom units, and 57 two-bedroom units). Fifteen of the dwelling units would be reserved as "very low-income" units. The proposed building would include a maximum of eight stories (approximately 91 feet above the lowest grade to the top of the parapet), six levels of residential floors over two levels of parking, and one subterranean level of parking. A total of 210 on-site vehicular parking spaces would be provided , which adheres to AB 744, and 127 bicycle parking spaces would be provided as required by the LAMC. The Proposed Project is located on an approximately 53,610 square foot lot that would include approximately 160,830 square feet of total floor area with a floor area ratio (FAR) of 3:1.

The Applicant is requesting the following approvals from the City: (1) A Density Bonus Compliance pursuant to Los Angeles Municipal Code ("LAMC") Section 12.22 A.25 to permit new construction of a 180-unit apartment building utilizing a 35% Density Bonus, including 11% Very Low Income Housing Units with the following on-menu incentives: (i) an increase in Floor Area Ratio ("FAR") pursuant to LAMC 12.22 A.25(f)(4)(ii) for a maximum FAR of 3:1 in lieu of the otherwise permitted 1.5:1 FAR; and (ii) a 20% decrease in open space required pursuant to LAMC 12.22 A.25(f)(6) for a minimum requirement of 15,540 square feet of total usable open space in lieu of the otherwise required 18,425 square feet of total usable open space; (2) Site Plan Review pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of 180 residential units and 210 on-site parking spaces; and (3) a Waiver of Dedications and Improvements to seek relief from a street dedication and improvement required on Arizona Street. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities which may include, but are not limited to, the following: demolition, excavation, shoring, grading, foundation, haul route (for the export of approximately 20,000 cubic yards of soil), and building construction for the Project Site.

APPLICANT:	**PREPARED BY:**	**ON BEHALF OF:**
Hanover R.S. Limited Partnership	Parker Environmental Consultants	The City of Los Angeles Department of City Planning Environmental Review Section

August 16, 2018

TABLE OF CONTENTS

List of Figures

List of Tables

APPENDICES

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		**COUNCIL DISTRICT:** 11 – Mike Bonin
PROJECT TITLE: 6711 Sepulveda Residential Project	**ENVIRONMENTAL CASE:** ENV-2017-4078-MND	**CASE NO.** DIR-2017-4077-DB-WDI-SPR

PROJECT LOCATION: 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045

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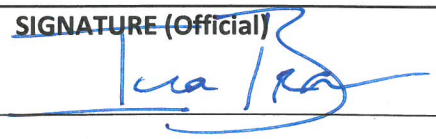
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Hanover R.S. Limited Partnership
5847 San Felipe, Suite 3600
Houston, TX 77057

FINDING: The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this Project. The mitigation measures outlined on the attached pages would reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the adopted mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Ira Brown	City Planning Associate	(213) 978-1453
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 North Spring Street, 7th Floor Los Angeles, CA 90012		August 16, 2018

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 11	**DATE:** August 16, 2018
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2017-4078-MND	**RELATED CASES:** DIR-2017-4077-DB-WDI-SPR	
PREVIOUS ACTIONS CASE NO.	❑ DOES have significant changes from previous actions. ❑ DOES NOT have significant changes from previous actions.	

I. **PROJECT DESCRIPTION:** The Proposed Project includes the demolition of an existing self-storage facility for the construction and development of an eight-story residential building with 180 dwelling units (18 studio units, 105 one-bedroom units, and 57 two-bedroom units). Fifteen of the dwelling units would be reserved as "very low-income" units. The proposed building would include a maximum of eight stories (approximately 91 feet above the lowest grade to the top of the parapet), six levels of residential floors over two levels of parking, and one subterranean level of parking. A total of 210 on-site vehicular parking spaces would be provided, which adheres to AB 744, and 127 bicycle parking spaces would be provided as required by the LAMC. The Proposed Project is located on an approximately 53,610 square foot lot that would include approximately 160,830 square feet of total floor area with a floor area ratio (FAR) of 3:1.

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ENVIRONMENTAL SETTING: The Project Site includes one parcel (Assessor Parcel No. 4110-001-004) that includes 53,610 square feet of lot area (1.23 acres). The Project Site is currently occupied by a vacant self-storage facility and surface parking. The surrounding properties are developed with office, commercial, light industrial, and low density residential uses. Further details are provided in the IS/MND analysis (attached).

PROJECT LOCATION: 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045			
COMMUNITY PLAN AREA: Westchester-Playa del Rey **STATUS:** ❑ Preliminary ❑ Proposed ☒ Adopted (2004)		☒ Does Conform to Plan ❑ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** West Los Angeles **CERTIFIED NEIGHBORHOOD COUNCIL:** Westchester-Playa del Rey
EXISTING ZONING: C4-1	**MAX DENSITY ZONING:** 1.5 to 1 FAR		**LA River Adjacent:** No
GENERAL PLAN LAND USE: General Commercial	**MAX. DENSITY PLAN:** 1.5 to 1 FAR		**PROPOSED PROJECT DENSITY:** 3:1 FAR

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.

Signature	City Planning Associate Title	(213) 978-1453 Phone

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

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

❑ **AESTHETICS** ❑ **AGRICULTURE AND FORESTRY RESOURCES** ❑ **AIR QUALITY** ☒ **BIOLOGICAL RESOURCES** ☒ **CULTURAL RESOURCES** ☒ **GEOLOGY AND SOILS**	❑ **GREENHOUSE GAS EMISSIONS** ☒ **HAZARDS AND HAZARDOUS MATERIALS** ❑ **HYDROLOGY AND WATER QUALITY** ❑ **LAND USE AND PLANNING** ❑ **MINERAL RESOURCES** ☒ **NOISE**	❑ **POPULATION AND HOUSING** ☒ **PUBLIC SERVICES** ❑ **RECREATION** ☒ **TRANSPORTATION AND TRAFFIC** ☒ **TRIBAL CULTURAL RESOURCES** ❑ **UTILITIES** ☒ **MANDATORY FINDINGS OF SIGNIFICANCE**

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

PROPONENT NAME: Hanover R.S. Limited Partnership **PHONE NUMBER**:

APPLICANT'S ADDRESS:
5847 San Felipe, Suite 3600
Houston, TX 77057

AGENCY REQUIRING CHECKLIST: City of Los Angeles Department of City Planning **DATE SUBMITTED:** February 21, 2018

PROPOSAL NAME (If Applicable): 6711 Sepulveda Residential Project

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
I.	**AESTHETICS**				
a.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	☐	☐	☒	☐
b.	WOULD THE PROJECT 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?	☐	☐	☐	☒
c.	WOULD THE PROJECT SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	☐	☐	☒	☐
d.	WOULD THE PROJECT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	☐	☐	☒	☐
II.	**AGRICULTURE AND FOREST RESOURCES**				
a.	WOULD THE PROJECT CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	☐	☐	☐	☒
b.	WOULD THE PROJECT CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	☐	☐	☐	☒
c.	WOULD THE PROJECT CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	☐	☐	☐	☒
d.	WOULD THE PROJECT RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒

e.	WOULD THE PROJECT INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
III.	**AIR QUALITY**				
a.	WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD AIR QUALITY MANAGEMENT PLAN OR CONGESTION MANAGEMENT PLAN?	❑	❑	☒	❑
b.	WOULD THE PROJECT VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	❑	❑	☒	❑
c.	WOULD THE PROJECT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	❑	❑	☒	❑
d.	WOULD THE PROJECT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑
e.	WOULD THE PROJECT CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑
IV.	**BIOLOGICAL RESOURCES**				
a.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	☒	❑
b.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	❑	☒
c.	WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	❑	❑	❑	☒

d.	WOULD THE PROJECT INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	❑	❑	☒
e.	WOULD THE PROJECT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	❑	☒	❑
f.	WOULD THE PROJECT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	❑	☒
V.	**CULTURAL RESOURCES**				
a.	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	❑	☒
b.	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
c.	WOULD THE PROJECT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	❑	❑	☒	❑
d.	WOULD THE PROJECT DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS**				
a.	WOULD THE PROJECT EXACERBATE HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	❑	❑	☒	❑
b.	WOULD THE PROJECT EXACERBATE HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR	❑	❑	☒	❑

	DEATH INVOLVING STRONG SEISMIC GROUND SHAKING?				
c.	WOULD THE PROJECT EXACERBATE HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	❑	❑	☒	❑
d.	WOULD THE PROJECT EXACERBATE HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING LANDSLIDES?	❑	❑	☒	❑
e.	WOULD THE PROJECT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	❑	❑	☒	❑
f.	WOULD THE PROJECT BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL 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?	❑	❑	☒	❑
g.	WOULD THE PROJECT BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY CAUSED IN WHOLE OR IN PART BY THE PROJECT EXACERBATING THE EXPANSIVE SOIL CONDITIONS?	❑	❑	☒	❑
h.	WOULD THE PROJECT 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?	❑	❑	❑	☒
VII.	**GREENHOUSE GAS EMISSIONS**				
a.	WOULD THE PROJECT GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	❑	❑	☒	❑
b.	WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	❑	❑	☒	❑

III.	HAZARDS AND HAZARDOUS MATERIALS				
a.	WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS?	❑	❑	☒	❑
b.	WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	❑	❑	☒	❑
c.	WOULD THE PROJECT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	❑	❑	☒	❑
d.	WOULD THE PROJECT BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	❑	❑	☒	❑
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 EXACERBATE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	❑	❑	☒	❑
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXACERBATE CURRENT ENVIRONMENTAL CONDITIONS SO AS TO RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	❑	❑	❑	☒
g.	WOULD THE PROJECT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	❑	❑	☒	❑
h.	WOULD THE PROJECT EXACERBATE EXISTING HAZARDOUS ENVIRONMENTAL CONDITIONS BY BRINGING PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	❑	☒

IX.	HYDROLOGY AND WATER QUALITY				
a.	WOULD THE PROJECT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑
b.	WOULD THE PROJECT SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	❑	❑	☒	❑
c.	WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	❑	❑	☒	❑
d.	WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	❑	❑	☒	❑
e.	WOULD THE PROJECT CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	❑	❑	☒	❑
f.	WOULD THE PROJECT OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	❑	❑	☒	❑
g.	WOULD THE PROJECT PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	❑	☒
h.	WOULD THE PROJECT PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	❑	☒
i.	E WOULD THE PROJECT XPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	❑	❑	❑	☒
j.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH	❑	❑	❑	☒

	INVOLVING INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?				
X.	**LAND USE AND PLANNING**				
a.	WOULD THE PROJECT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	❑	☒
b.	WOULD THE PROJECT CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	❑	❑	☒	❑
c.	WOULD THE PROJECT CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES**				
a.	WOULD THE PROJECT RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	❑	☒
b.	WOULD THE PROJECT RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	❑	☒
XII.	**NOISE**				
a.	DOES THE PROJECT RESULT IN THE EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	❑	☒	❑	❑
b.	DOES THE PROJECT RESULT IN THE EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	❑	☒	❑	❑
c.	WOULD THE PROJECT RESULT IN A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑
d.	WOULD THE PROJECT RESULT IN A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	☒	❑	❑

e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	☒	❑
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
XIII.	**POPULATION AND HOUSING**				
a.	WOULD THE PROJECT INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	❑	❑	☒	❑
b.	WOULD THE PROJECT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
c.	WOULD THE PROJECT DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
XIV.	**PUBLIC SERVICES**				
a.	WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENT FACILITIES, NEED FOR NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVE FOR ANY OF THE FOLLOWING PUBLIC SERVICES:				
i.	FIRE PROTECTION?	❑	❑	☒	❑
ii.	POLICE PROTECTION?	❑	☒	❑	❑
iii.	SCHOOLS?	❑	❑	☒	❑
iv.	PARKS?	❑	❑	☒	❑
v.	OTHER PUBLIC FACILITIES?	❑	❑	☒	❑

XV.	**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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
XVI.	**TRANSPORTATION AND TRAFFIC**				
a.	WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	☐	☒	☐	☐
b.	WOULD THE PROJECT 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?	☐	☐	☒	☐
c.	WOULD THE PROJECT RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	☐	☐	☐	☒
d.	WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	☐	☐	☒	☐
e.	WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?	☐	☐	☒	☐
f.	WOULD THE PROJECT CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	☐	☐	☒	☐

XVII. TRIBAL CULTURAL RESOURCES					
	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANT OF A TRIBAL CULTURAL RESOURCES, DEFINED IN PUBLIC RESOURCES CODE SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:				
a.	LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC CODE SECTION 5020.1(K)?	❑	❑	☒	❑
b.	A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1. IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE?	❑	❑	☒	❑
XVIII. UTILITIES AND SERVICE SYSTEMS					
a.	WOULD THE PROJECT EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	☒	❑
b.	WOULD THE PROJECT REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑
c.	WOULD THE PROJECT 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?	❑	❑	☒	❑
d.	WOULD THE PROJECT HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	❑	☒	❑
e.	WOULD THE PROJECT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S	❑	❑	☒	❑

	PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?				
f.	WOULD THE PROJECT BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑
g.	WOULD THE PROJECT COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑
XIX.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	❑	❑	❑	☒
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	❑	❑	☒	❑
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	❑	☒	❑	❑

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's

Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2017-4078-MND** and the associated case(s), **DIR-2017-4077-DB-WDI-SPR**. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers: visit the City's website at http://www.lacity.org; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps – http://gmw.consrv.ca.gov/shmp/ Engineering/Infrastructure/Topographic Maps/Parcel Information – http://boemaps.eng.ci.la.ca.us/index0.1htm or City's main website under the heading "Navigate LA."

PREPARED BY:	**TITLE:**	**TELEPHONE NO.:**	**DATE:**
Parker Environmental Consultants		(661) 257-2282	August 16, 2018

APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

	Impact	Explanation	Mitigation Measures
I. AESTHETICS			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
II. AGRICULTURAL RESOURCES			
a.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
III. AIR QUALITY			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
IV. BIOLOGICAL RESOURCES			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
V. CULTURAL RESOURCES			
a.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
VI. GEOLOGY AND SOILS			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
VII. GREENHOUSE GAS EMISSIONS			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	HAZ-1
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
g.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
IX. HYDROLOGY AND WATER QUALITY			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
g.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
i.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
j.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
X. LAND USE AND PLANNING			
a.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
XI. MINERAL RESOURCES			
a.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
XII. NOISE			
a.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	N-1, N-2, N-3, N-4
b.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	N-1, N-2, N-3, N-4
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	N-1, N-2, N-3, N-4

	Impact	Explanation	Mitigation Measures
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
XIII. POPULATION AND HOUSING			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
XIV. PUBLIC SERVICES			
a.i	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
a.ii	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	PS-1
a.iii	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
a.iv	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
a.v	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
XV. RECREATION			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
XVI. TRANSPORTATION AND TRAFFIC			
a.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	T-1
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
XVII. TRIBAL CULTURAL RESOURCES			
a.i	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
a.ii	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
XVIII. UTILITIES AND SERVICE SYSTEMS			
a.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
XIX. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	No Impact.	See environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See environmental analysis (attached).	No mitigation measures are required.
c.	Potentially Significant Unless Mitigation Incorporated.	See environmental analysis (attached).	See mitigation measures above.

SUMMARY OF MITIGATION MEASURES

AESTHETICS

No mitigation measures are required.

AGRICULTURE AND FORESTRY RESOURCES

No mitigation measures are required.

AIR QUALITY

No mitigation measures are required.

BIOLOGICAL RESOURCES

No mitigation measures are required.

CULTURAL RESOURCES

No mitigation measures are required.

GEOLOGY AND SOILS

No mitigation measures are required.

GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS

HAZ-1 Soil Management Plan

- A Soil Management Plan shall be developed to address site logistics and handling of soil impacted with the COCs or other environmental issues that may arise during excavation. During grading and excavation activities, suspect soil identified through field screening will likely require segregation and stockpiling for future testing and disposition along with sampling and testing to ascertain if the suspect material has been removed. The Soil Management Plan shall address field screening, laboratory sampling, establish action levels for removal and verification, identifying appropriate action levels, site logistics, and soil handling and disposition and verification of remaining conditions on the property. Verification may include additional soil sampling, and a health risk assessment.

- The Applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous

material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.

HYDROLOGY AND WATER QUALITY

No mitigation measures are required.

LAND USE AND PLANNING

No mitigation measures are required.

MINERAL RESOURCES

No mitigation measures are required.

NOISE

Increased Noise Levels (Demolition, Grading, and Construction Activities)

N-1 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

N-2 Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

N-3 The project contractor shall use power construction equipment with noise shielding and muffling devices.

N-4 The project contractor shall erect a temporary noise-attenuating sound barrier along the western and southern property lines of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 5-dBA reduction in sound level.

POPULATION AND HOUSING

No mitigation measures are required.

PUBLIC SERVICES

PS-1 Public Services (Police – Demolition/Construction Sites)

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

RECREATION

No mitigation measures are required.

TRANSPORTATION AND TRAFFIC

T-1 Increased Vehicle Trips in Culver City

- In consultation with the City of Los Angeles Department of Transportation, the Proposed Project shall make a one-time financial contribution of $50,000 to the City of Culver City towards its Intelligent Transportation System projects or projects that encourage the use of alternative modes of transportation. With this contribution, the City of Culver City accepts that a reduction of 0.01 in the v/c ratio at the intersection of Sepulveda Boulevard and Centinela Avenue is appropriate and applicable as an impact mitigation for that intersection.

TRIBAL CULTURAL RESOURCES

No mitigation measures are required.

UTILITIES AND SERVICE SYSTEMS

No mitigation measures are required.

MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

I. INTRODUCTION

PROJECT INFORMATION

Project Title: 6711 Sepulveda Boulevard Project

Project Location: 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045

Project Applicant: Hanover R.S. Limited Partnership
5847 San Felipe, Suite 3600
Houston, TX 77057

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

PROJECT SUMMARY

The Proposed Project includes the demolition of an existing self-storage facility for the construction and development of an eight-story residential building with 180 dwelling units (18 studio units, 105 one-bedroom units, and 57 two-bedroom units). Fifteen of the dwelling units would be reserved as "very low-income" units. The proposed building would include a maximum of eight stories (approximately 91 feet above the lowest grade to the top of the parapet), six levels of residential floors over two levels of parking, and one subterranean level of parking. A total of 210 on-site vehicular parking spaces would be provided, which adheres to AB 744, and 127 bicycle parking spaces would be provided as required by the LAMC. The Proposed Project is located on an approximately 53,610 square foot lot that would include approximately 160,830 square feet of total floor area with a floor area ratio (FAR) of 3:1.

The Applicant is requesting the following approvals from the City: (1) Density Bonus Compliance pursuant to Los Angeles Municipal Code ("LAMC") Section 12.22 A.25 to permit new construction of a 180-unit apartment building utilizing a 35% Density Bonus, including 11% Very Low Income Housing Units with the following on-menu incentives: (i) an increase in Floor Area Ratio ("FAR") pursuant to LAMC 12.22 A.25(f)(4)(ii) for a maximum FAR of 3:1 in lieu of the otherwise permitted 1.5:1 FAR; and (ii) a 20% decrease in open space required pursuant to LAMC 12.22 A.25(f)(6) for a minimum requirement of 15,540 square feet of total usable open space in lieu of the otherwise required 18,425 square feet of total usable open space; (2) Site Plan Review pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of 180 residential units and 210 on-site parking spaces; and (3) a Waiver of Dedications and Improvements to seek relief from a street dedication and improvement required on Arizona Street. The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities which may include, but are not limited to, the following: demolition, excavation, shoring, grading, foundation, haul route (for the export of approximately

20,000 cubic yards of soil), and building construction for the Project Site.

ORGANIZATION OF THE INITIAL STUDY

This expanded IS/MND is organized into six sections as follows:

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

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

Project Description: This Section provides a detailed description of the Proposed Project, including the environmental setting, project characteristics, related project information, and environmental clearance requirements.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

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

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

II. PROJECT DESCRIPTION
A. PROJECT LOCATION

PROJECT LOCATION

The Project Site is located within the boundaries of the Westchester – Playa del Rey Community Plan area in the City of Los Angeles. The Project Site's address is 6711 S. Sepulveda Boulevard, Los Angeles, California 90045. The Project Site includes approximately 53,610 square feet of gross lot area (1.23 acres). The Project Site consists of a vacant self-storage facility and its associated surface parking and a portion of undeveloped land. The former storage facility occupied the Project Site from late 2002 until January 31, 2017. As shown in Figure II-1, Project Location Map, the Project Site is located approximately 500 feet southwest from San Diego Freeway (I-405) and approximately 0.5 miles northwest from a San Diego Freeway on-ramp and off-ramp on Howard Hughes Parkway. The Project Site is located approximately 10 miles southwest of Downtown Los Angeles and approximately two miles north of the Los Angeles International Airport (LAX). The Project Site is bound by a Public Storage facility to the north, Sepulveda Boulevard to the east, an office building to the south, and a mix of industrial, low-density residential single-family homes, and undeveloped land to the west and southwest. A summary of the Project Site's property addresses, Assessor's Parcel Number (APN), and gross lot area is summarized in Table II-1, Project Site Summary, below:

Table II-1
Project Site Summary

Property Address	APN	Existing Use	Lot Area (Square Feet)
6711 S. Sepulveda Boulevard	4110-001-004	Vacant self-storage facility (18,849 square feet)	53,610
		TOTAL LOT AREA:	**53,610**

Sources:
- City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed October 2017
- Iacobellis & Associates, Inc., ALTA/NSPS Land Title Survey, 6711 S. Sepulveda Boulevard, May 2, 2017.

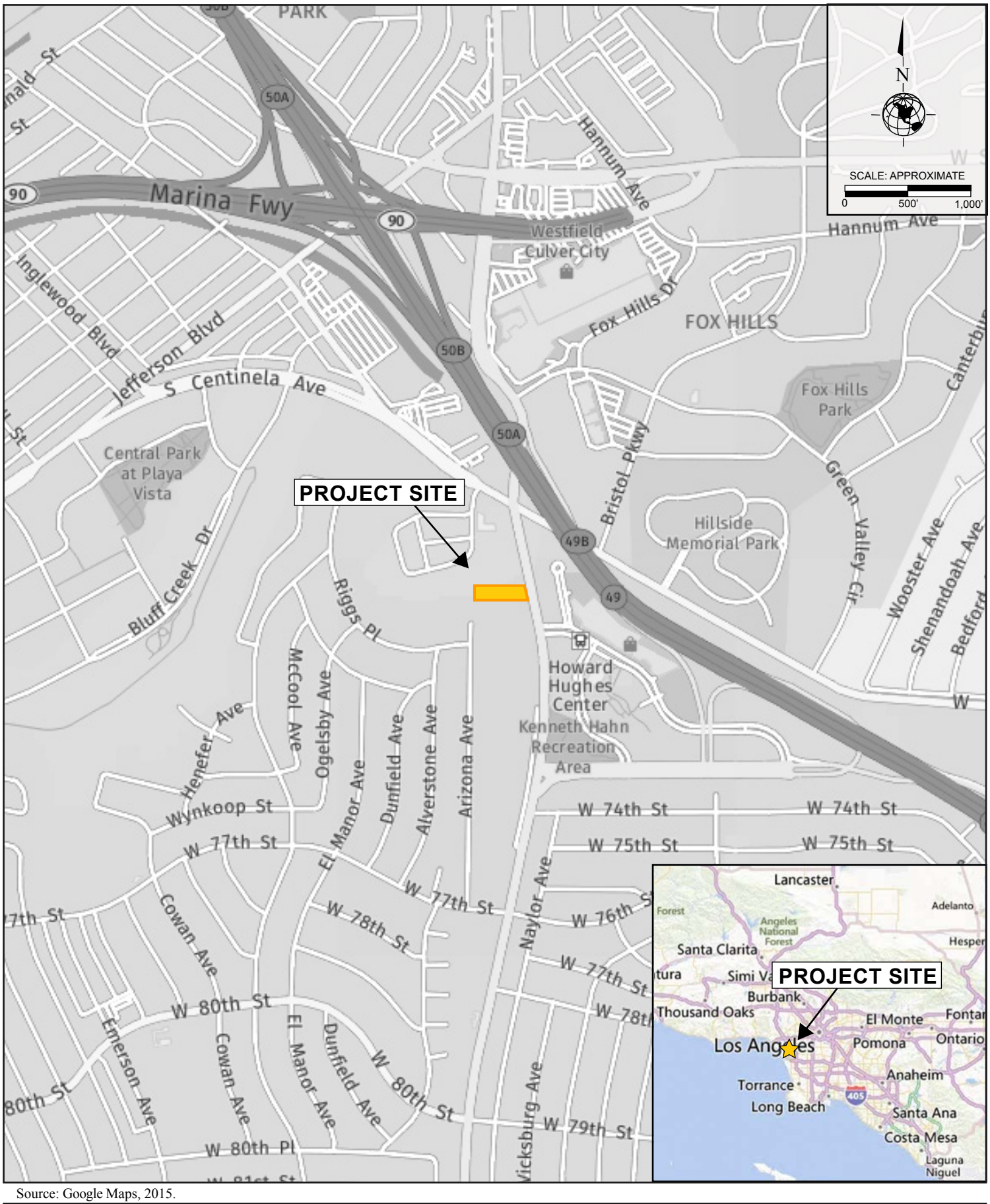
Regional and Local Access

Regional Access

The Project Site is located in the western part of the City of Los Angeles, close to Playa Vista and the City of Culver City. The Project Site is proximate to two freeways; the San Diego Freeway (I-405) and the Marina Freeway (SR-90).

Roadways

Sepulveda Boulevard, Center Drive, Howard Hughes Parkway, and Centinela Avenue are in the immediate Project vicinity and provide local access to the Project Site.



Source: Google Maps, 2015.

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Figure II-1
Project Location Map

Sepulveda Boulevard: Sepulveda Boulevard is located immediately east of the Project Site. Sepulveda Boulevard is a two-way street providing four travel lanes in the northbound direction and three travel lanes in the southbound direction. It is classified as a Boulevard I in the City of Los Angeles Mobility 2035 Plan, and a Primary Artery in the City of Culver City Circulation Element. On-street parking is generally restricted on both sides of the street.

Center Drive: Center Drive is an east-west roadway located less than 200 feet south of the Project Site. Center Drive is a two-way street providing two travel lanes in each direction to the east of the Project Site. It is classified as a Local Street in the City of Los Angeles Mobility 2035 Plan. On-street parking is generally restricted on both sides of the street.

Howard Hughes Parkway: Howard Hughes Parkway is an east-west roadway located approximately a ¼-mile south of the Project Site. Howard Hughes Parkway is a two-way street providing three travel lanes in the westbound direction and two travel lanes in the eastbound direction. It is classified as a Boulevard II in the City of Los Angeles Mobility 2035 Plan. On-street parking is generally restricted on both sides of the street.

Centinela Avenue: Centinela Avenue is an east-west roadway located approximately 600 feet north of the Project Site. Centinela Avenue is a two-way street providing four travel lanes in the eastbound direction and three travel lanes in the westbound direction, to the north of the Project Site. It is classified as a Boulevard II in the City of Los Angeles Mobility 2035 Plan, and a Primary Artery in the City of Culver City Circulation Element. On-street parking is generally provided on both sides of the street with some restrictions.

Public Transportation

The Project Site is located in an area with bus service provided by a total of three local and inter-city transit operators. Within a quarter-mile radius of the Project Site, Metro (Los Angeles County Metropolitan Transportation Authority) operates two bus lines; LADOT operates one Commuter Express bus line; and Culver City operates three bus lines.

Metro Bus Service

Metro operates two local bus lines in the vicinity of the Project Site, both of which run on Sepulveda Boulevard and serve the Project Site. Route 110 runs between Playa Vista and Bell Gardens, and operates between approximately 5:15 A.M. to 10:20 P.M. eastbound and 5:40 A.M. to 11:40 P.M. westbound. It runs at about 15 to 30 minute headways in the eastbound direction and 12 to 20 minute headways in the westbound direction during weekday peak periods. Route 217 runs between Fox Hill and Hollywood, and operates between approximately 4:55 A.M. to 7:20 P.M. in the northbound direction and 5:50 A.M. to 7:30 P.M. in the southbound direction. It runs at about 30-minute headways in the northbound direction and 60-minute headways in the southbound direction during weekday peak periods.

LADOT - Commuter Express

LADOT operates the Commuter Express local bus system, of which one route (route 574) serves the Project area during the weekdays. This bus line operates every 30 minutes on the southbound direction during the A.M. peak period, with no buses operating on the northbound direction. Route 574 operates every 30 minutes on the southbound direction during the P.M. peak period, with no buses operating on the northbound direction.

Culver City Bus Service

The City of Culver City operates local and rapid bus lines. There are a total of three bus lines, including one rapid line and two local lines that serve the Project Site and provides access to various points in the city. Route 6 is a rapid line that operates every 15 minutes during the weekday A.M. and P.M. peak periods. Route 6 also has a local line that serves Sepulveda Boulevard. The other local line is Route 3. This route runs through Sepulveda Boulevard, Centinela Avenue, and Green Valley Circle. The local lines operate every 12 to 20 minutes during the weekday A.M. and P.M. peak periods.

ZONING AND LAND USE DESIGNATIONS

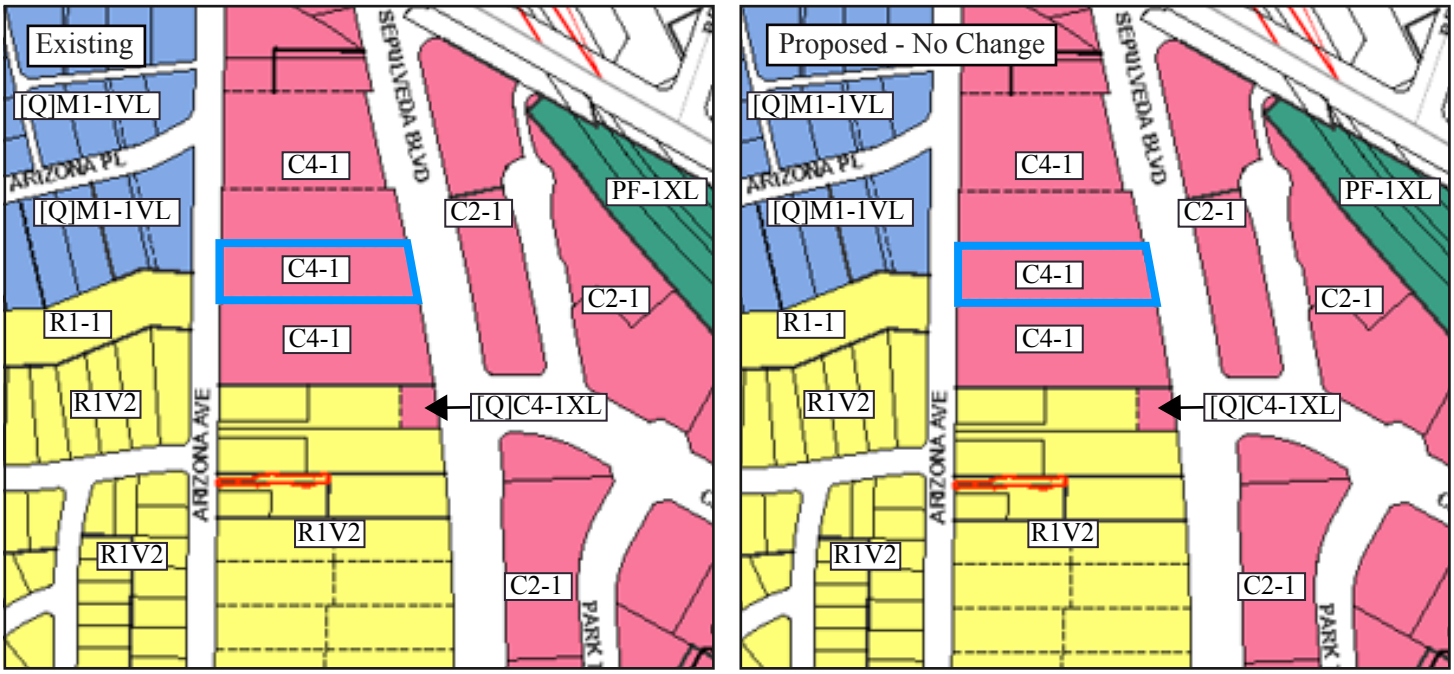
As shown in Figure II-2, Existing and Proposed Zoning and Land Use Designations, the Project Site is zoned C4-1, with a General Plan land use designation of General Commercial. A C4 zoning designation corresponds to the General Commercial land use designation and allows a range of commercial uses plus multi-family residential development at an R4 zone density (i.e., 400 square feet of lot area per dwelling unit). Height District 1 allows unlimited building height, but limits development to a floor area ratio (FAR) of 1.5:1.

The Project Site is also located within the Los Angeles Coastal Transportation Corridor Specific Plan Area, in a Freeway Adjacent Advisory Notice area (ZI-2427), and in a Transit Priority Area in the City of Los Angeles.

Westchester – Playa Del Rey Community Plan

The Project Site is located within the Westchester – Playa Del Rey Community Plan ("Community Plan") area of the City of Los Angeles. The General Plan land use designation of General Commercial corresponds with the following zones: C1.5, C2, C4, CR, RAS3, and RAS4. The Project Site's C4 zoning is therefore consistent with the Community Plan's land use designation. The Community Plan area is comprised of two communities: Westchester and Playa del Rey. The Project Site is located in the Westchester Community. Planning goals, objectives, policies and programs are created to meet the existing and future needs of the community through the year 2025. The Community Plan identifies and provides for economic opportunities, and for the maintenance of significant environmental resources within the community. It also seeks to enhance the distinctive community identity and recognize and promote the unique character of neighborhoods within the Community Plan Area.

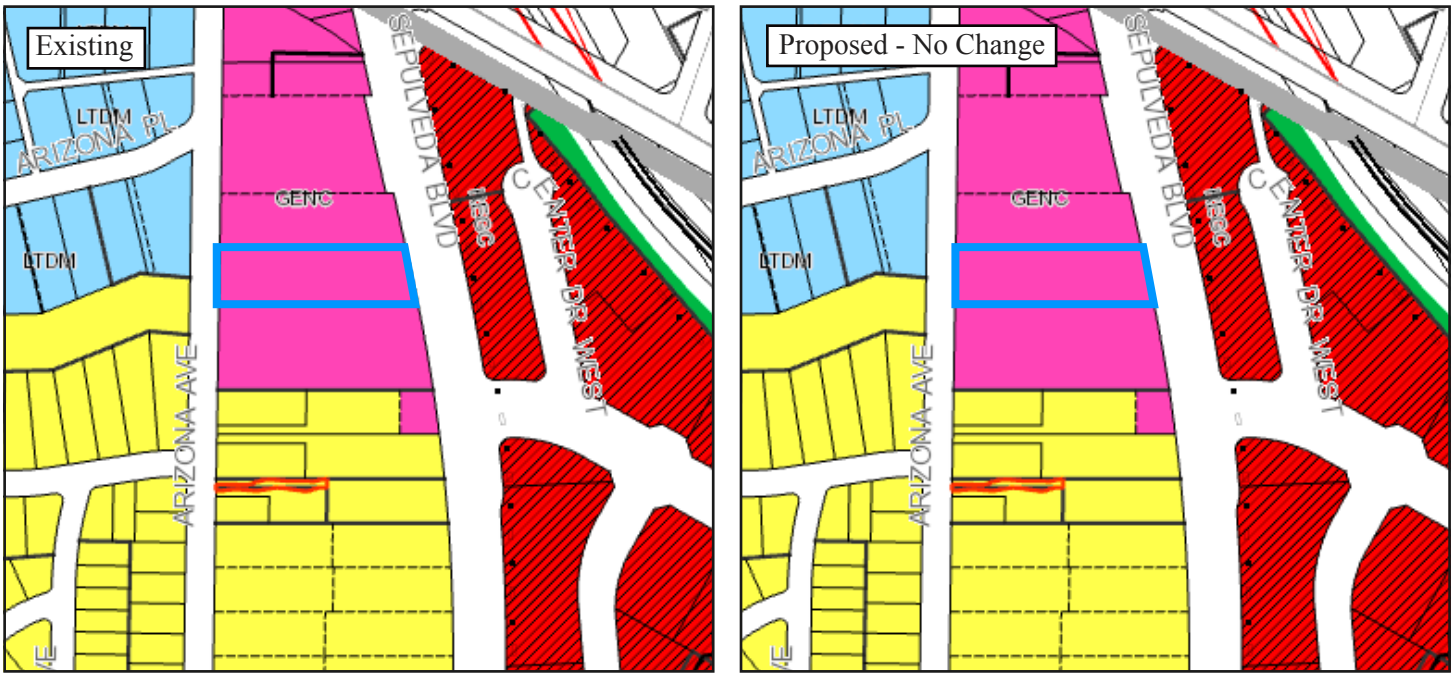
Zoning Designations



LEGEND

- Project Site
- Zoning: C2 and C4
- Zoning: R1
- Zoning: M
- Zoning: PF

General Plan Land Use Designations



LEGEND

- Project Site
- Regional Commercial
- General Commercial
- Low Density Residential
- Limited Manufacturing
- Public Facilities

Source: Zimas, City of Los Angeles, Department of City Planning, 2017; and Parker Environmental Consultants, 2017.

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Figure II-2
Existing and Proposed
Zoning and General Plan Land Use Designations

The Westchester-Playa del Rey Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

Los Angeles Coastal Transportation Corridor Specific Plan

The Project Site is located within the Coastal Transportation Corridor Specific Plan ("Specific Plan") area. The Specific Plan was effectuated September 22, 1993 (Ordinance No. 168,999). The Coastal Transportation Corridor Specific Plan intends to:

- Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new commercial and industrial development within the corridor;
- Establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M and P Zones and for development on property owned by the Department of Airports;
- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
- Establish a Coastal Transportation Corridor infrastructure implementation process;
- Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from severe overload;
- Avoid Peak Hour Level of Service (LOS) on streets and interchanges from reaching LOS F or, if presently at LOS F, preclude further deterioration in the LOS;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Reduce commuter trips by encouraging the development of affordable housing at or near job site;
- Ensure that the public transportation facilities that will be constructed with funds generated by the Specific Plan will significantly benefit the contributor; and
- Encourage Caltrans to widen the San Diego Freeway for high occupancy vehicle lanes.[1]

The Proposed Project is required to have approval from LADOT and the City Engineer in order to be issued a building permit. It is important to note that this Specific Plan is currently undergoing an update. A draft

[1] *City of Los Angeles, Department of City Planning, Coastal Transportation Corridor Specific Plan, September 22, 1993, http://planning.lacity.org/complan/specplan/pdf/CTrans.pdf, accessed October 2017.*

version of the Specific Plan Update and Draft EIR were released in January 2016, and could be adopted at some point in 2018. If applicable, the Proposed Project would comply with the updated Specific Plan.

Transit Priority Area (SB 743)

In 2013, the State of California enacted SB 743, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. As state law, SB 743 supersedes the aesthetic impact thresholds in the *L.A. CEQA Thresholds Guide (2006)*, including those established for aesthetics, obstruction of views, shading,[2] and nighttime illumination.

The Project Site is defined as an infill site within a Transit Priority Area as defined by CEQA and the City of Los Angeles.[3] The Project Site is served by several bus routes with peak commute service intervals of 15 minutes or less along major roadways such as Sepulveda Boulevard and Centinela Avenue. These bus lines include two Metro bus lines: 110 and 217; LADOT Community Express line 574; and Culver City bus lines: rapid Route 6R, local Route 6, and local Route 3. Pursuant to LAMC 12.22.A-25.f.4, the Proposed Project is located within 1,500 feet of a "Transit Stop," which includes a Metro Rapid Bus stop along a Metro Rapid Bus route. (See Appendix L, Transit Route Data and Affordable Housing Referral Form).

EXISTING CONDITIONS

The Project Site consists of one parcel and contains a currently vacant 18,849 square-foot self-storage facility and its associated parking lot. The building was recently vacated in January 2017 and still remains occupiable without any discretionary approvals. The parking spaces and loading area are located to the north and west of the storage facility. The Project Site is sloped; the western portion of the Project Site is undeveloped and consists of vegetation, which includes grasses and shrubs. Elevations across the Project Site greatly range from lower elevations on the larger developed portion of the Project Site and increase

[2] *CEQA Guidelines Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The L.A. CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued ZI No. 2452, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts.*

[3] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed October 2017.*

westward to the undeveloped portion of the Project Site. See Figure II-3, Aerial View of the Project Site and Surrounding Land Uses. There is one tree (E. Red Cedar) located on the Project Site along the eastern property line, adjacent to Sepulveda Boulevard. There are no trees in the public right-of-way.

As shown in the aerial view and photographs depicting the current conditions of the Project Site (See Figure II-3 and II-4), the Project Site is an infill development that is bordered by commercial properties fronting Sepulveda Boulevard to the immediate north of the Project Site, a commercial office building to the immediate south of the Project Site, Sepulveda Boulevard to the immediate east of the Project Site, and undeveloped land to the immediate west of the Project Site. Limited manufacturing land uses are located to the northwest of the Project Site. Single-family homes are located further southwest of the Project Site. The general topography of the area increases in elevation from east to west and north to south. In terms of elevation, the Project Site sits lower than the residential land uses located further south and southwest.

SURROUNDING LAND USES

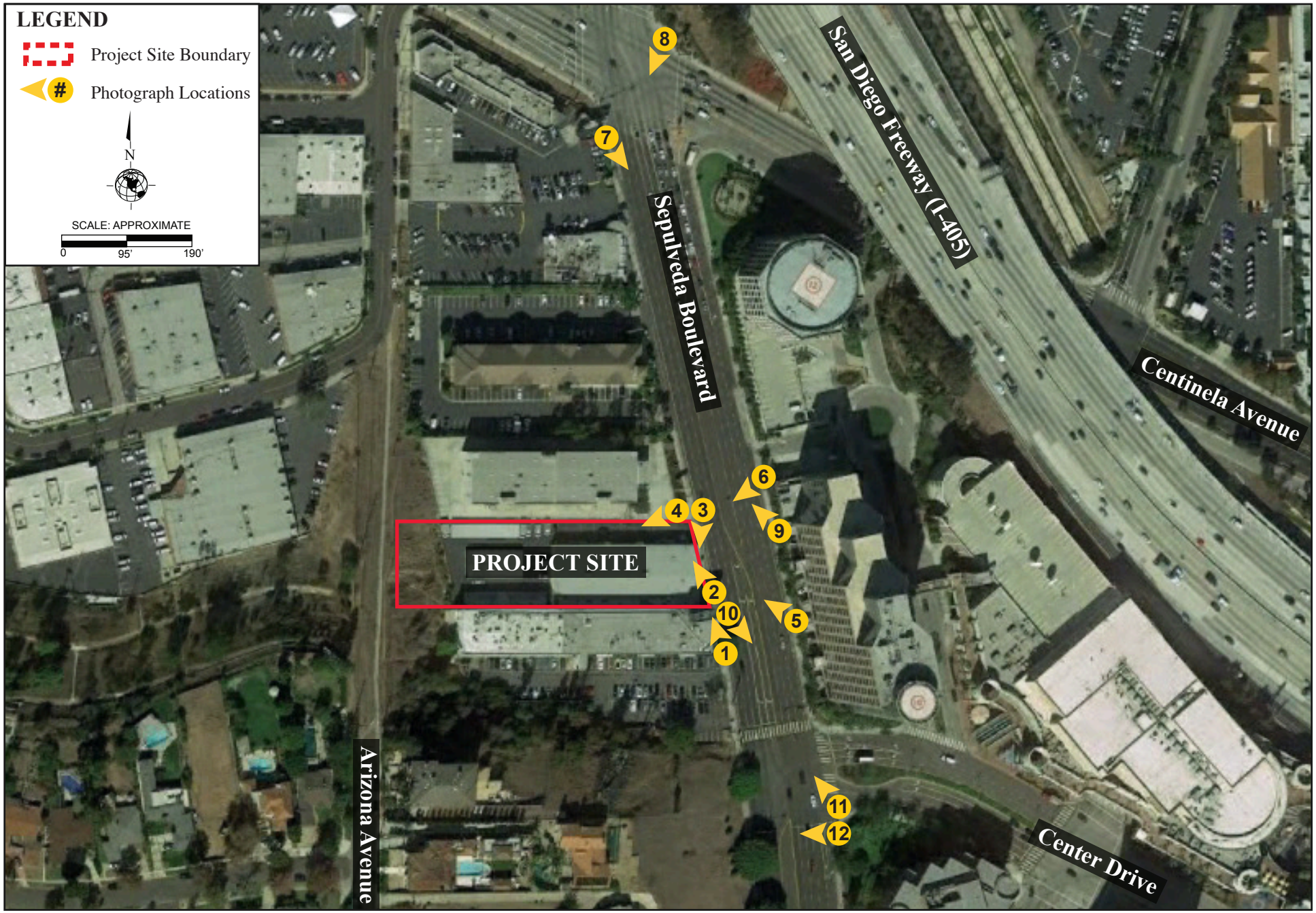
Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of Surrounding Land Uses. As shown in Figure II-5, the Project Site is surrounded by single-family residential uses, industrial uses, commercial uses, office uses, and undeveloped land.

North: Commercial properties are located north of the Project Site fronting Sepulveda Boulevard. A four-story Public Storage building immediately abuts the Project Site to the north. The properties further north of the Public Storage building are an Extended Stay America hotel and a family restaurant. Similar to the Project Site, these properties to the north are zoned C4-1 with land use designations of General Commercial. These buildings range in height from one to four stories. (See Figure II-5, View 8 and 9.)

East: The Project Site is bordered by Sepulveda Boulevard to the immediate east. A 15-story office building is located east of the Project Site, across Sepulveda Boulevard. A seven-story commercial office building is located to the northeast of the Project Site. The Howard Hughes Center is located further east, which is a mixed-use shopping center containing a variety of retail stores, restaurants, and entertainment. The properties to the east are zoned C2-1 with land use designations of Regional Commercial. (See Figure II-5, View 7.)

South: The Project Site is immediately bordered by a three-story commercial office building and its associated surface parking lot to the south. This property is currently proposed for a five-story residential development with 176 dwelling units (ENV-2016-1649-MND). This property is primarily zoned C4-1 with a small undeveloped portion is zoned [Q]C4-1XL. (See Figure II-5, View 11). An undeveloped hillside is located further south and southwest where low-density residential homes are located at a higher elevation than the Project Site and the adjacent commercial properties. These residential properties are zoned R1-1 and R1V2 with land use designations of Low Density Residential (See Figure II-5, View 12).

West: The Project Site is immediately bordered by an undeveloped hillside to the west. Further west and northwest are one-story limited manufacturing land uses. These light manufacturing buildings front Arizona Place and Arizona Circle. These properties are zoned [Q]M1-1VL with land use designations of Limited Manufacturing.



Source: Google Earth, Aerial View, October 2016.

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Figure II-3
Aerial Photograph of the Project Site and Surrounding Land Uses

View 1: From the west side of Sepulveda Boulevard, looking north at the building on the Project Site.

View 2: From the west side of Sepulveda Boulevard, looking northwest at the building on the Project Site.

View 3: From the west side of Sepulveda Boulevard, looking south at the building on the Project Site.

View 4: From the west side of Sepulveda Boulevard, looking west at the north side of the Project Site.

View 5: From the east side of Sepulveda Boulevard, looking northwest at the Project Site.

View 6: From the east side of Sepulveda Boulevard, looking southwest at the building, driveway along the northern side, and undeveloped hillside on the western side of the Project Site.

Source: Parker Environmental Consultants, August 9, 2017.

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Figure II-4
Photographs of the Project Site
Views 1-6

View 7: From the west side of Sepulveda Boulevard, looking southeast at the properties that border the east side of Sepulveda Boulevard to the east of the Project Site.

View 8: From the northeast corner of the intersection of Sepulveda Boulevard and Centinela Avenue, looking southwest at the commercial uses to the north of the Project Site.

View 9: From the east side of Sepulveda Boulevard, looking northwest at the Public Storage facility and the Extended Stay Hotel properties that border the Project Site to the north.

View 10: From the west side of Sepulveda Boulevard, looking southeast at the commercial uses to the southeast of the Project Site.

View 11: From the southeast corner of the intersection of Sepulveda Boulevard and Center Drive, looking northwest at the commercial building to the immedate south of the Project Site.

View 12: From the southeast corner of the intersection of Sepulveda Boulevard and Center Drive, looking west at the single-family residential uses to the south of the Project Site.

Source: Parker Environmental Consultants, August 9, 2017.

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Figure II-5
Photographs of Surrounding Land Uses
Views 7-8

II. PROJECT DESCRIPTION
B. PROJECT CHARACTERISTICS

PROPOSED DEVELOPMENT

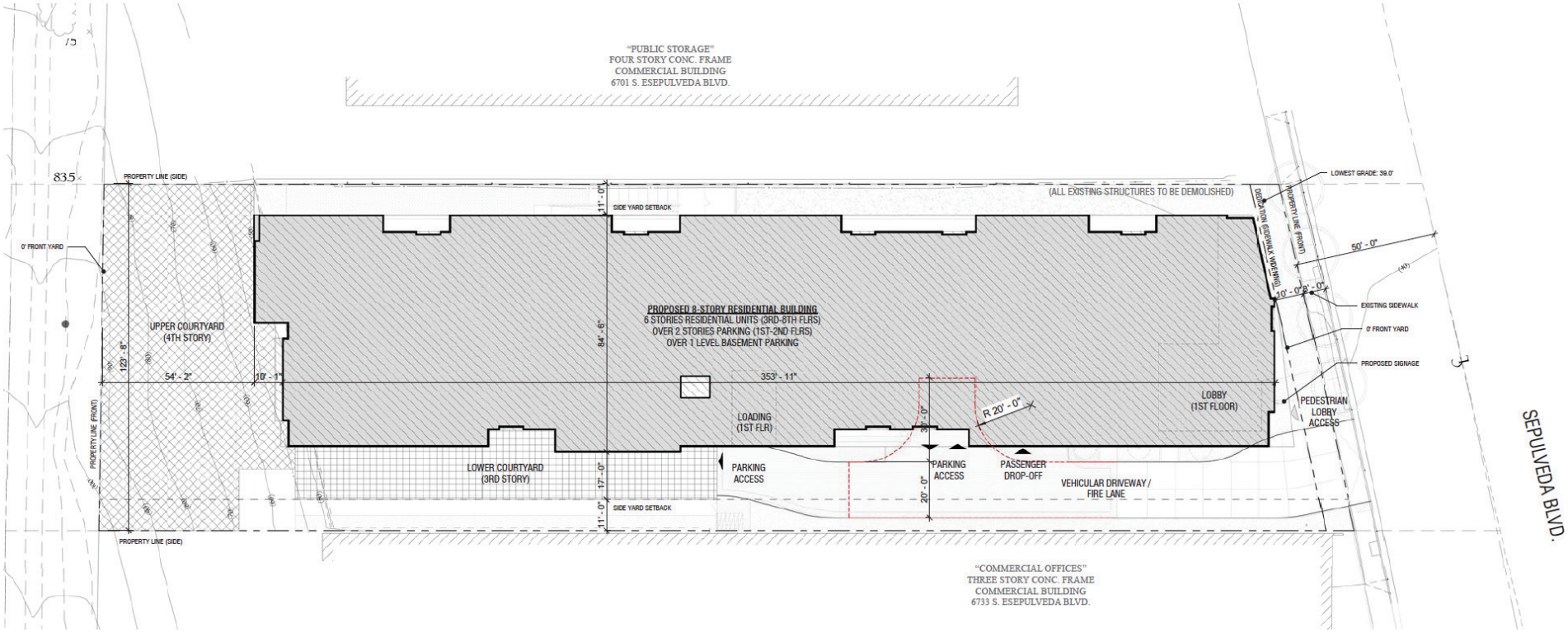
The Proposed Project includes the demolition of the existing self-storage building and surface parking for the construction of a 180-unit apartment building. The proposed structure would be eight stories high with a building height of 91 feet. The Proposed Project would develop a residential structure, with six levels of residential units above two levels of parking and one subterranean parking level. The Proposed Project also includes the development of 15,540 square feet of open space, 210 parking spaces, and 127 bicycle parking spaces on-site. The Proposed Project includes a total of 160,830 square feet of floor area with a proposed floor area ratio (FAR) of 3:1. A summary of the Proposed Project is provided in Table II-2, Proposed Development Program. Figure II-6, below, shows the site plan for the Proposed Project. The Proposed Project's parking levels and building floor plans are provided in Figure II-7 through Figure II-12.

Table II-2
Proposed Development Program

Land Uses	Proposed Dwelling Units Mix	Proposed Floor Area (Square Feet)
Proposed Project:		
Residential		
Studio	18	160,830
One-Bedroom	105	
Two-Bedroom	57	
TOTAL:	**180**	**160,830 sf**
	Floor Area Ratio:	**3:1**
Source: TCA Architects, October 11, 2017.		

Residential Uses

As shown in Table II-2, above, the Proposed Project would include a maximum of 180 units and residential support areas within six floors (Level 3 through Level 8). The unit mix includes 18 studio units, 105 one-bedroom units, and 57 two-bedroom units of varying sizes and configurations. Eleven (11) percent of the base density (15 units) would be reserved as "Very Low-Income" units. The building would include residential support areas such as a residential lobby, leasing office, mailroom, and trash room. The Proposed Project would also include residential amenities including, but not limited to, a dog walking area, an outdoor courtyard and lounging area, barbecue grills, fire pit, a pool deck, community room, a sky deck, and balconies.



Source: TCA Architects, October 11, 2017.

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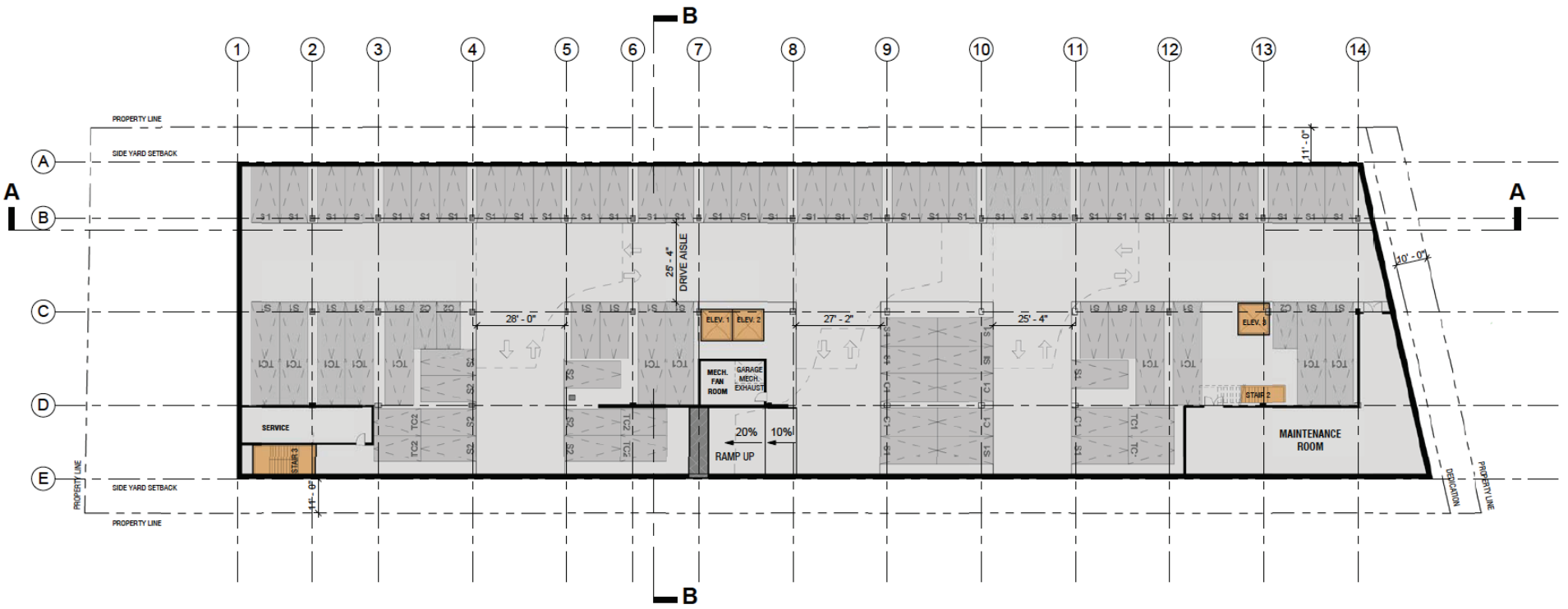
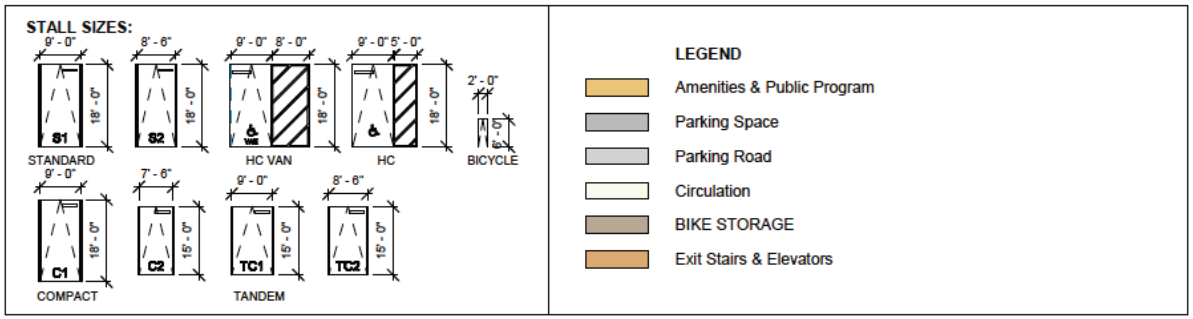
Figure II-6
Plot Plan





LEGEND

- Amenities & Public Program
- Parking Space
- Parking Road
- Circulation
- BIKE STORAGE
- Exit Stairs & Elevators

Source: TCA Architects, October 11, 2017.

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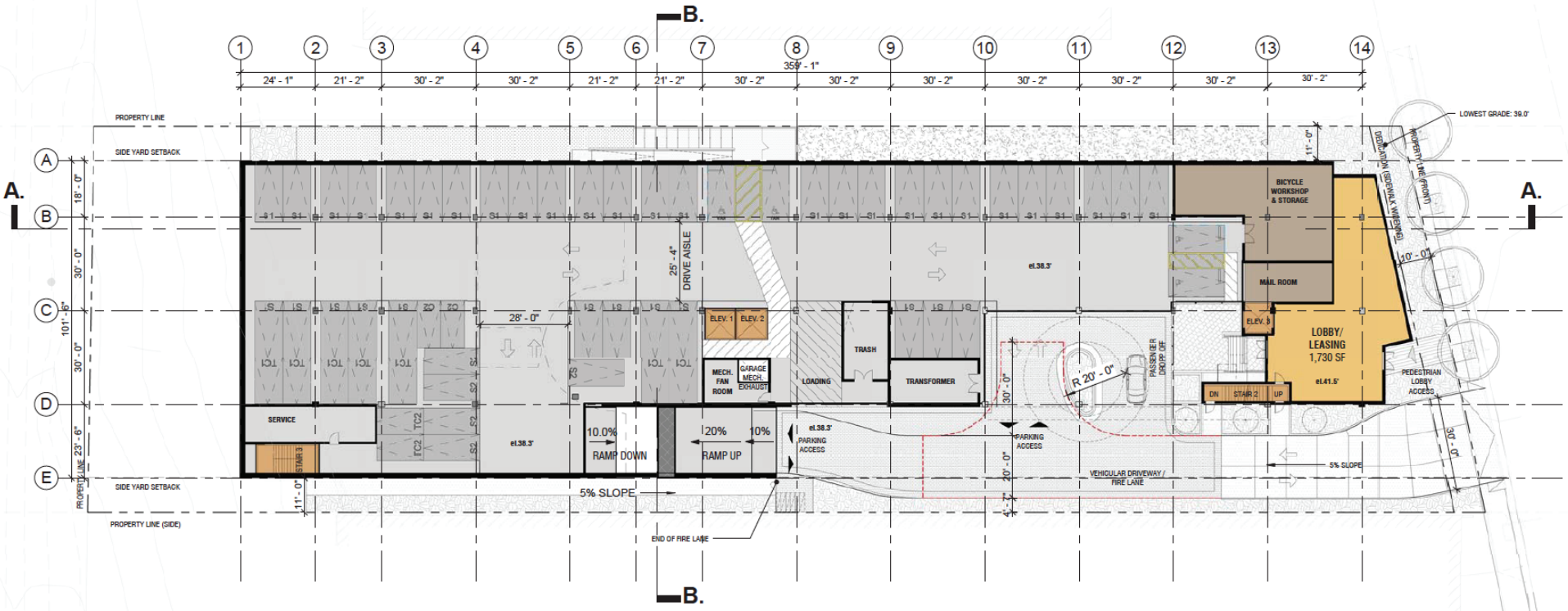
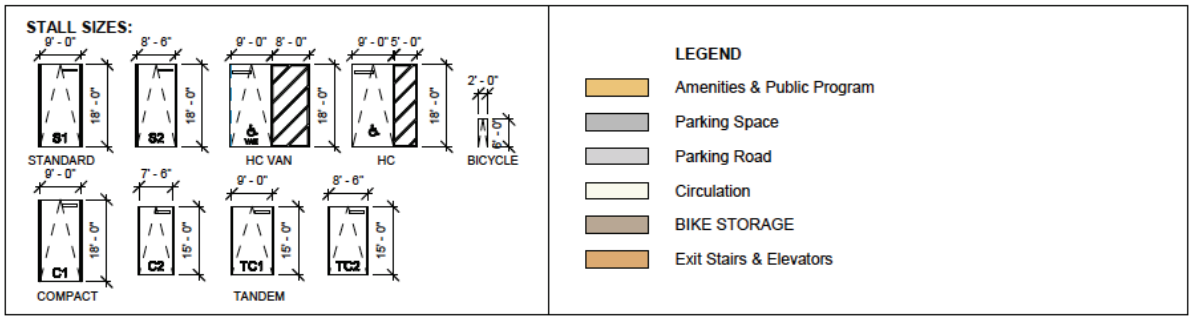
Figure II-7
Basement Floor Plan





LEGEND

- Amenities & Public Program
- Parking Space
- Parking Road
- Circulation
- BIKE STORAGE
- Exit Stairs & Elevators

Source: TCA Architects, October 11, 2017.

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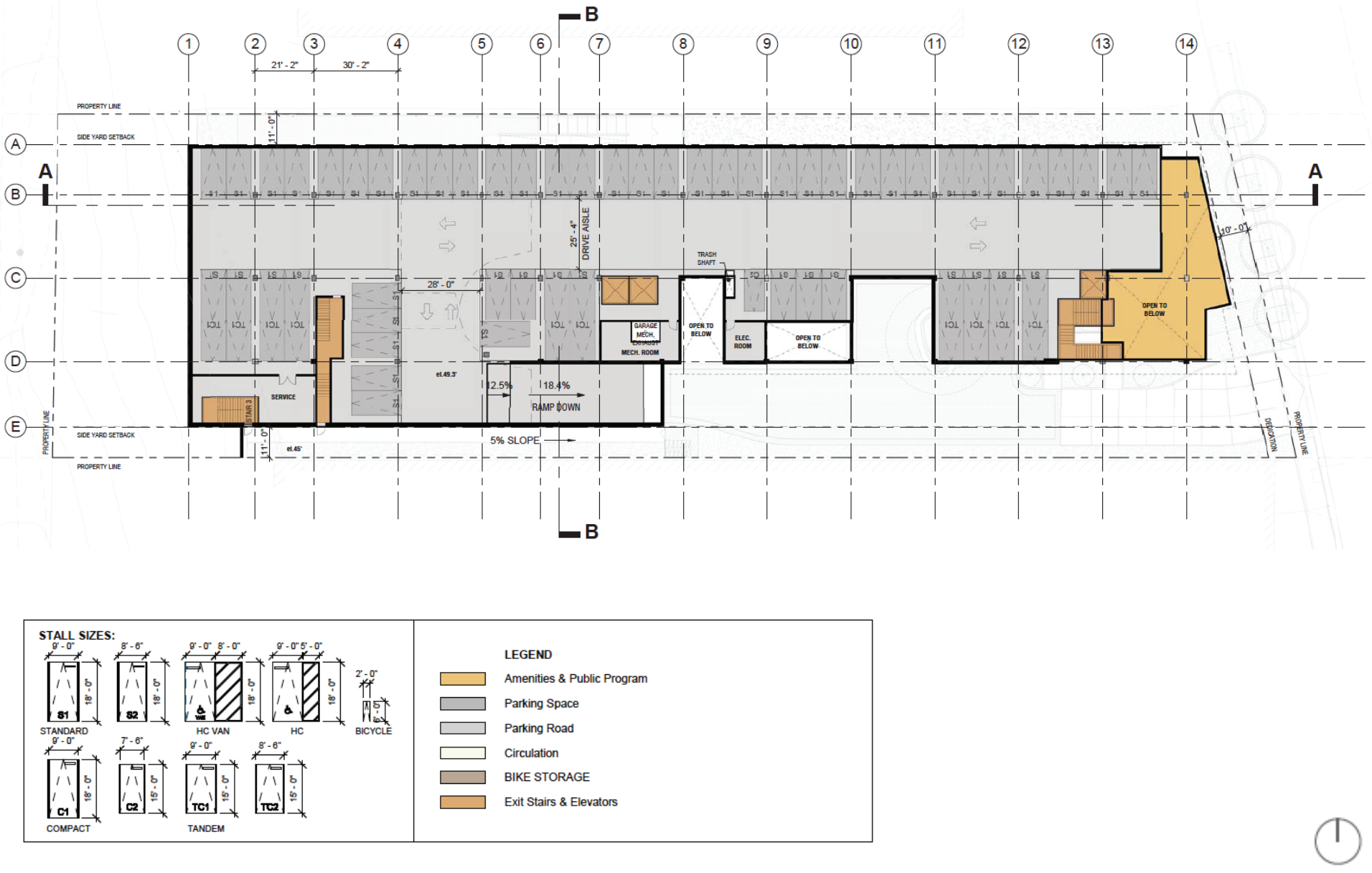
Figure II-8
First Floor Plan



Source: TCA Architects, October 11, 2017.

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Figure II-9
Second Floor Plan

Source: TCA Architects, October 11, 2017.

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Figure II-10
Third to Fourth Floor Plans

Source: TCA Architects, October 11, 2017.

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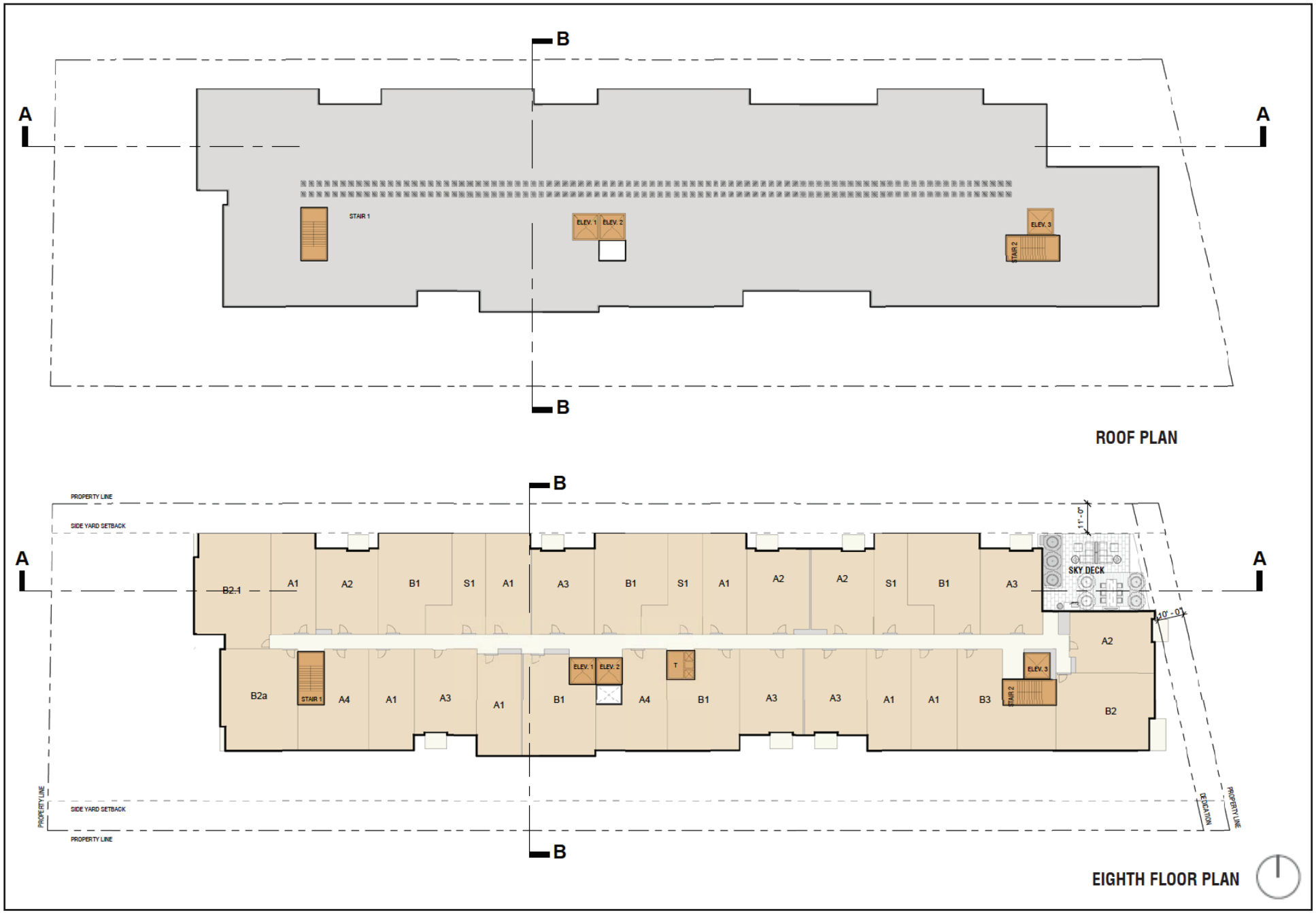
Figure II-11
Fifth to Seventh Floor Plans



Source: TCA Architects, October 11, 2017.

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Figure II-12
Eighth to Roof Floor Plans

Floor Area

The Project Site is approximately 53,610 square feet (1.23 acres). Pursuant to the C4 zoning on-site, which allows a maximum FAR of up to 1.5 to 1. Pursuant to LAMC Section 12.22 A.25, the Applicant would set aside 11 percent of its base density for very low-income housing units, which entitles the Applicant to an on-menu incentive to increase the allowed FAR to a maximum of 3:1 FAR, which equals 160,830 square feet of allowed floor area. The Proposed Project includes a total of 160,830 square feet with a corresponding FAR of 3:1.

Density

Pursuant to Section 12.16.A of the LAMC, the lot area requirements of the R4 Zone applies to all portions of buildings erected and used for residential purposes in the C4 Zone. Under the R4 Zone, the minimum lot area per dwelling unit shall be 400 square feet, which equals a base density of 134 units for the Proposed Project. The Applicant would set aside 11 percent of its base density for very low-income housing units, which entitles the Applicant to a 35 percent density bonus. As such, with the density bonus, the 180 proposed dwelling units would be less than the permitted density of 183 units.

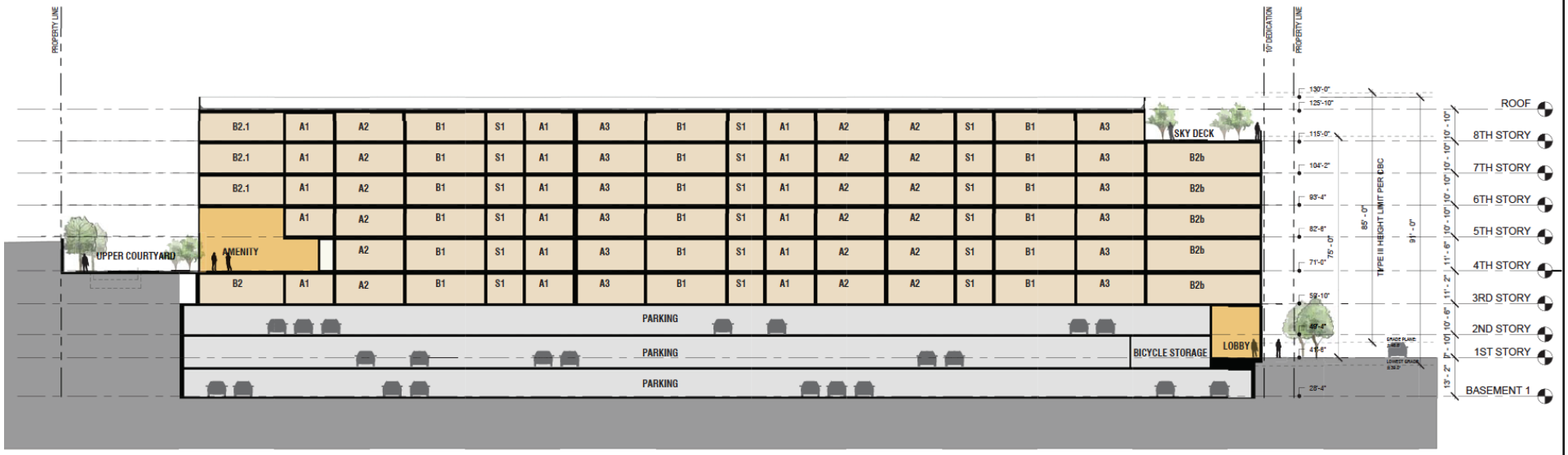
Setbacks

Pursuant to LAMC Section 12.16.C, front yards are not required for a C4 zone. Side yards shall be applied for portions of buildings used for residential purposes, which requires that one foot shall be added to the width of the required 5-foot side yard for each additional story above the 2nd floor. Due to the orientation of the Project Site, rear yards are not applicable to the Project Site since it is considered a "through lot" with two front yards. Therefore, the Proposed Project would require no front yard setbacks and 11-foot side yard setbacks. The Proposed Project would provide an approximate 11-foot side yard setback on the northern property line and an 11-foot side yard setback on the southern property line.

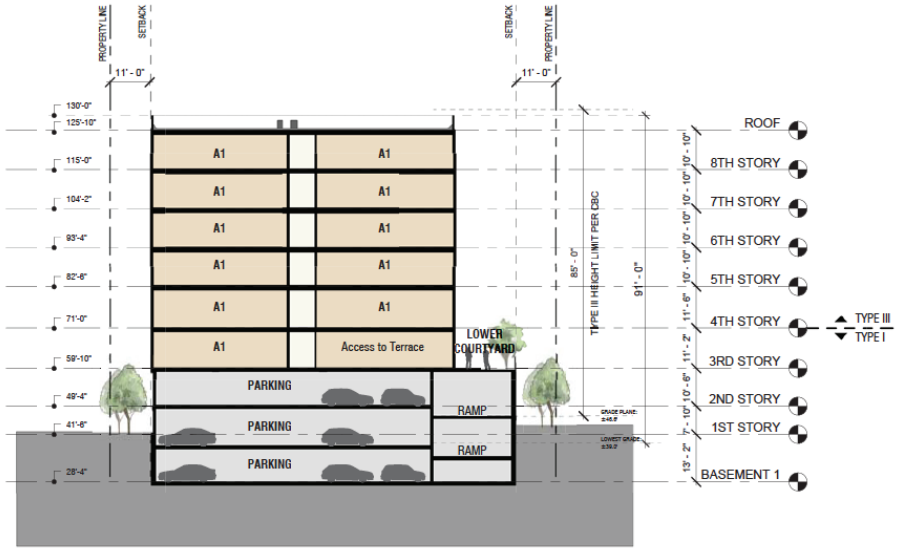
Building Height

The Project Site is zoned C4-1. Height District No. 1 permits unlimited building height for the C4 zone. The elevation of the Project Site is approximately 55 feet above MSL and slightly slopes to the northeast. The Project Site is also located in an airport hazard area and has a 250-foot height limit above elevation 126 above MSL.[4] Due to the difference in elevation across the Project Site, the proposed building would reach a maximum height of approximately 91 feet above grade from the lowest grade point on the eastern property line. The Proposed Project has a maximum height of approximately 130 feet above MSL at the top of the parapet, which would be well below the height limit of 376 feet above MSL. The Proposed Project's building sections are depicted in Figure II-13. The buildings elevations are illustrated in Figure II-14 and Figure II-15.

[4] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: www.zimas.lacity.org, accessed October 2017.*



SECTION A-A



SECTION B-B

Source: TCA Architects, October 11, 2017.

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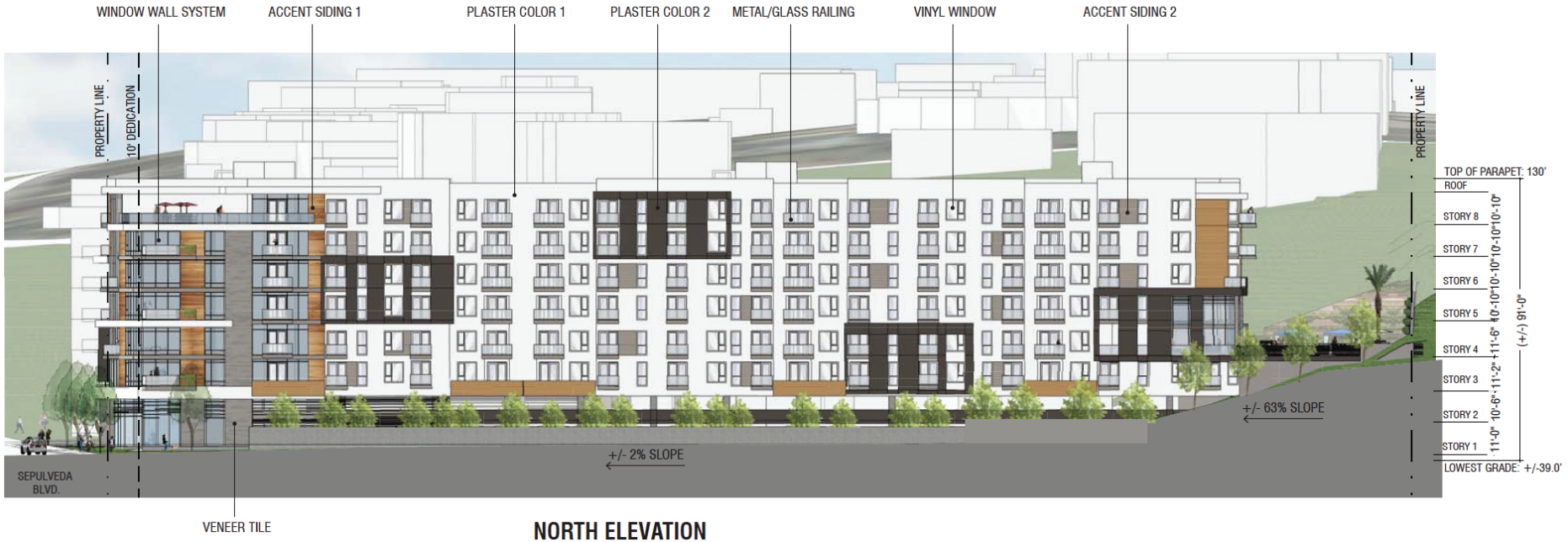
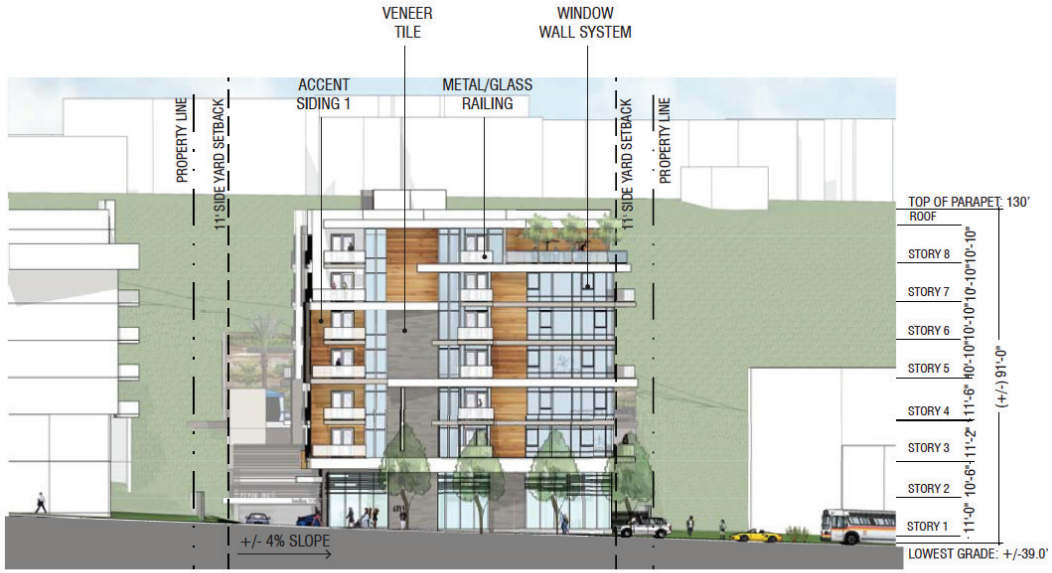
Figure II-13
Building Sections



NORTH ELEVATION



EAST ELEVATION

Source: TCA Architects, October 11, 2017.

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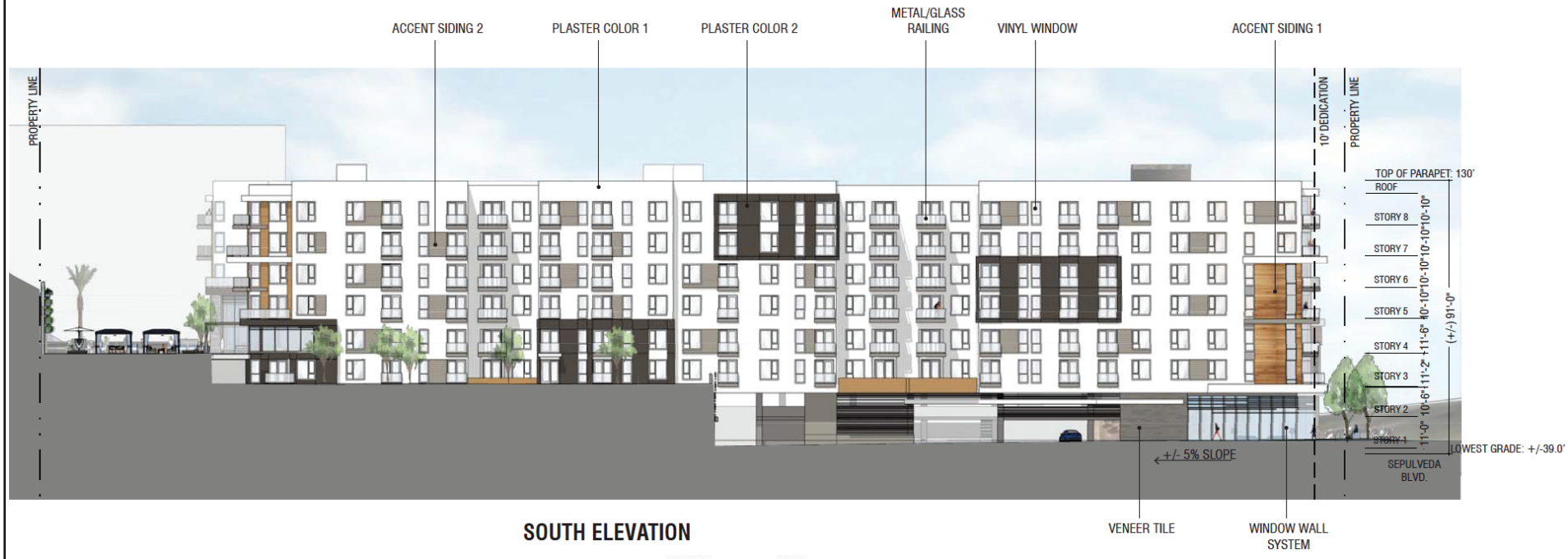
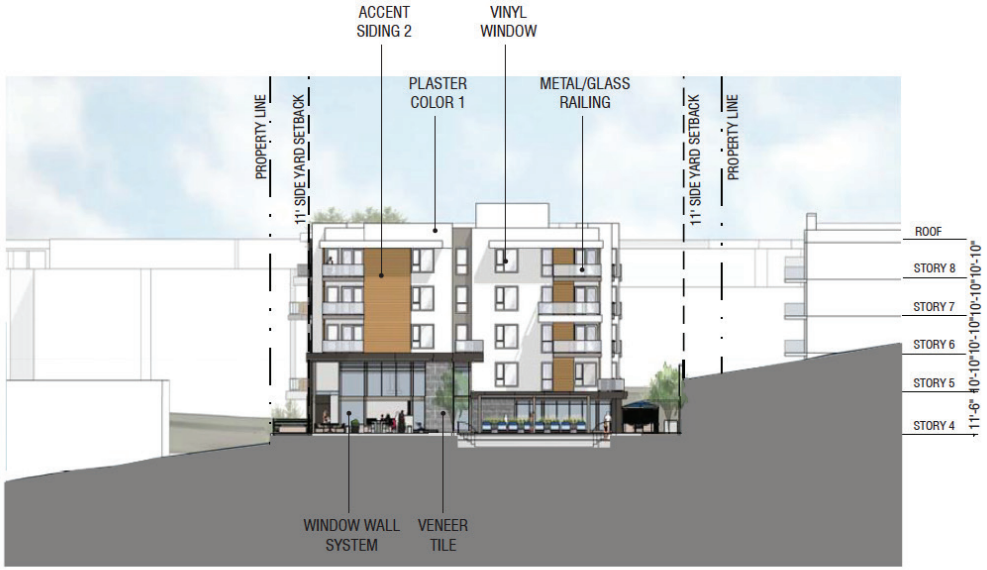
Figure II-14
North and East Elevations



SOUTH ELEVATION



WEST ELEVATION

Source: TCA Architects, October 11, 2017.

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Figure II-15
South and West Elevations

Architectural Features

The Proposed Project would consist of an eight-story residential building. Structured parking would be provided in two levels of above-grade parking and one level of subterranean parking. Architectural materials include but are not limited to vinyl windows, window walls, metal/glass railings, plaster, accent siding, and veneer tiles. Architectural renderings of the proposed building are depicted in Figure II-16, Architectural Renderings.

Open Space and Landscaping

The Proposed Project would provide open space areas, which may include a dog walking area, an outdoor courtyard and lounging area, barbecue grills, fire pit, a pool deck, community room, a sky deck, and balconies. The amenities would be located on the ground floor, third floor (lower courtyard), fourth floor (upper courtyard), and eighth floor (sky deck). The Proposed Project would also provide 45 trees on site, which meets the minimum of 45 required trees on site. The Applicant is requesting a 20 percent reduction in required open space as a Density Bonus on-menu incentive. As summarized in Table II-3, below, the Proposed Project would satisfy the minimum open space requirements of the LAMC, with the 20 percent reduction pursuant to an on-menu density bonus incentive, by providing 15,540 square feet of open space. Illustrations depicting the landscape plans of the ground floor, third floor, fourth floor, and eighth floor are shown in Figure II-17 and Figure II-18.

Table II-3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	Dwelling Units	Open Space (square feet)
Less than 3 Habitable Rooms (100 sf/du) [a]	123	12,300
3 Habitable Rooms (125 sf/du) [b]	57	7,125
Total Required:		***18,425***
20% Reduction [c]:		*-3,885*
Total Required with Reduction:		**15,540**
Proposed Open Space	**Open Space (square feet)**	
Ground Floor Amenities	600	
Level 3 Terrace	2,700	
Level 4 Pool Courtyard & Amenities	8,100	
Level 8 Sky Deck	990	
Balconies	3,150	
Total Proposed:	**15,540**	

Notes: du = dwelling unit; sf = square feet
[a] *Includes studios and one-bedroom units.*
[b] *Includes two-bedroom units.*
[c] *The Applicant is requesting a 20% reduction in required open space as a Density Bonus on-menu incentive.*
Source: TCA Architects, October 11, 2017.

CONCEPT RENDERING
VIEW AT SEPULVEDA BLVD.

CONCEPT RENDERING
VIEW AT PROJECT ENTRY

CONCEPT RENDERING
VIEW AT UPPER COURTYARD

Source: TCA Architects, October 11, 2017.

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Figure II-16
Architectural Renderings

OPEN SPACE / LANDSCAPING

Location	Common Open Space (SF)	Landscape Area (SF)
Ground Amenities	600	0
L3 Terrace	2,700	490
L4 Pool Courtyard & Amenities	8,100	1,363
L8 Skydeck	1,000	90
Total Proposed	12,400	1,943

These Plans are in Compliance with the Density Bonus Incentive Requirement for Open Space (LAMC 12.22.A.25.f.6)

TREES PROVIDED

Location	Tree Quantity
Ground Amenities	18
L3 Terrace	14
L4 Pool Courtyard & Amenities	6
L8 Skydeck	7
Total Proposed	45

GROUND FLOOR PLAN

OPEN SPACE / LANDSCAPING

Location	Common Open Space (SF)	Landscape Area (SF)
Ground Amenities	600	0
L3 Terrace	2,700	490
L4 Pool Courtyard & Amenities	8,100	1,363
L8 Skydeck	1,000	90
Total Proposed	12,400	1,943

These Plans are in Compliance with the Density Bonus Incentive Requirement for Open Space (LAMC 12.22.A.25.f.6)

TREES PROVIDED

Location	Tree Quantity
Ground Amenities	18
L3 Terrace	14
L4 Pool Courtyard & Amenities	6
L8 Skydeck	7
Total Proposed	45

THIRD FLOOR - LOWER COURTYARD PLAN

Source: GWH Landscape Architects, October 11, 2017.

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Figure II-17
Ground Floor and Third Floor Landscape Plans

OPEN SPACE / LANDSCAPING

Location	Common Open Space (SF)	Landscape Area (SF)
Ground Amenities	600	0
L3 Terrace	2,700	490
L4 Pool Courtyard & Amenities	8,100	1,363
L8 Skydeck	1,000	90
Total Proposed	12,400	1,943

These Plans are in Compliance with the Density Bonus Incentive Requirement for Open Space (LAMC 12.22.A.25.f.6)

TREES PROVIDED

Location	Tree Quantity
Ground Amenities	18
L3 Terrace	14
L4 Pool Courtyard & Amenities	6
L8 Skydeck	7
Total Proposed	45

EIGHTH FLOOR - SKY DECK PLAN

OPEN SPACE / LANDSCAPING

Location	Common Open Space (SF)	Landscape Area (SF)
Ground Amenities	600	0
L3 Terrace	2,700	490
L4 Pool Courtyard & Amenities	8,100	1,363
L8 Skydeck	1,000	90
Total Proposed	12,400	1,943

These Plans are in Compliance with the Density Bonus Incentive Requirement for Open Space (LAMC 12.22.A.25.f.6)

TREES PROVIDED

Location	Tree Quantity
Ground Amenities	18
L3 Terrace	14
L4 Pool Courtyard & Amenities	6
L8 Skydeck	7
Total Proposed	45

FOURTH FLOOR - UPPER COURTYARD PLAN

Source: GWH Landscape Architects, October 11, 2017.

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Figure II-18
Fourth Floor and Eighth Floor Landscape Plans

Parking and Access

Pursuant to AB 744, the Proposed Project is required to provide a total of 119 parking spaces. As seen in Table II-4, below, the Proposed Project would provide a total of 210 parking spaces in one level of subterranean parking and two levels of above-grade parking. While the number of parking spaces proposed exceeds the minimum parking required by the LAMC, the amount of parking provided is intended to provide for efficient utilization of the parking garage and meet the anticipated on-site parking demands of the Project's residents. The Proposed Project proposes one main entry driveway from the west side of Sepulveda Boulevard at the southeast corner of the Project Site. The driveway provides access to the parking garage. The Proposed Project would meet the minimum requirements for on-site parking.

Table II-4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity (units)	Parking Required by Code [a]		Parking Provided
		Rate	Spaces	
Proposed Project				
Studio	18	0.5 space per du	9	--
1 Bedroom	105	0.5 space per du	53	--
2 Bedroom	57	1 space per du	57	--
		TOTAL:	**119**	**210**

Notes:
[a] *AB 744 – Planning Zoning: Density Bonuses*
Source: TCA Architects, October 11, 2017.

Pursuant to the LAMC Bicycle Ordinance (Section 12.21.A.16), the Proposed Project is required to provide 12 short-term bicycle spaces and 115 long-term bicycle spaces for a total of 127 bicycle stalls. The Proposed Project would provide 127 bicycle stalls. As summarized in Table II-5, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces.

Table II-5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Requirement [a]		Total Spaces Required		Total
		Short Term	Long Term	Short Term	Long Term	
Residential						
1-25 dwelling units	25	1 : 10	1 : 1	3	25	28
26-100 dwelling units	75	1 : 15	1 : 1.5	5	50	55
101-200 dwelling units	80	1 : 20	1 : 2	4	40	44
Total	180 du			**12**	**115**	**127**
			Total Spaces Proposed	**12**	**115**	**127**

Notes: du = dwelling unit
[a] *LAMC 12.21 A.16. Bicycle Parking and Shower Facilities.*
Source: TCA Architects, October 11, 2017.

Construction

Construction Schedule/Phasing

This analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2020. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition/site clearing; (2) excavation, grading and foundations; (3) building construction; and (4) architectural coating, paving, and finishing.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

This phase would include the demolition of the existing building (approximately 18,849 square feet), paved surface parking, and landscaping. In addition, this phase may include the removal of the tree, walls, fences, and associated debris. The demolition/site clearing would be completed in approximately one month.

Excavation, Grading and Foundation Phase

After the completion of demolition/site clearing, the excavation phase for the Proposed Project would occur for approximately three months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. The Proposed Project would require approximately 20,000 cubic yards (cy) of soil to be hauled off-site in order to build the subterranean parking level. Haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety.

Building Construction Phase

During the last month of the excavation and grading phase, the building construction phase would occur for approximately 16 months. The building construction phase consists of below grade and above grade structures including building foundations, basement walls, parking structure, residential structures, and laying irrigation for landscaping the Project Site.

Architectural Coating, Paving, and Finishing

During the final months of the building construction phase, the finishing/architectural coating phase would involve installation of windows, doors, cabinetry, appliances, and would also involve the application of interior and exterior paint and finish-coating materials. The final phase of construction would entail paving the sidewalks and installing hardscape and landscaping features throughout the common areas. This phase also involves the laying of concrete or asphalt along the adjacent roads and setbacks. It is estimated that architectural coatings, finishing, and the paving phases would occur over the final four months of the building construction phase.

Temporary Right-of-Way Encroachment

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Any required traffic lane and right-of-way closures will be properly permitted by the City agencies and will conform to City standards, pursuant to the Construction Management Plan that is described in this IS/MND and which will be a required mitigation measure for the Proposed Project.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon landfill, which accepts construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 27 miles north of the Project Site (approx. 54 miles round trip). For recycling efforts, Southern California Disposal facility (located at 1908 Frank Street in the City of Santa Monica) accepts construction and demolition waste for recycling and is located approximately seven miles northwest from the Project Site (approx. 14 miles round trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve trucks with a 14 cubic yard hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route traveling to the San Diego Freeway (I-405) from the Project Site would utilize Sepulveda Boulevard (southbound) and the Howard Hughes Parkway on-ramp. The local haul route traveling from the I-405 to the Project Site would utilize the Jefferson Boulevard off-ramp and Sepulveda Boulevard (southbound). The haul route may be modified in compliance with City policies, provided DOT and/or Street Services approves any such modification.

RELATED PROJECTS

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

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*

(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

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

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

The related projects identified are included in Table II-6, Related Projects List, below. A total of 21 related projects were identified in the Project area, within the City of Los Angeles and City of Culver City. Of the 21 related projects, 14 projects are located within the City of Los Angeles, and seven projects are located within the City of Culver City. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section III of this IS/MND. The locations of the related projects are shown in Figure II-19, Location of Related Projects.

Table II-6
Related Projects List

Project Number [a, b]	Project Name	Location/Address	Land Use	Size	Units
1	Mixed-Use	7407 S. La Tijera Boulevard	Apartments Retail	140 2,600	du sf
2	Chick-fil-A Fast Food Restaurant [c]	8521 S. Sepulveda Boulevard	Restaurant	3,999	sf
3	Hooman Auto Dealer	5748 Mesmer Avenue	Auto Dealership	113,163	sf
4	Office Expansion	12777 W. Jefferson Boulevard	Office	49,950	sf
5	Apartments	6733 Sepulveda Boulevard	Apartments	176	du
6	Charter Middle School	8540 S. La Tijera Boulevard	School	350	stu
7	Multi-story Office Building	12575 W. Beatrice Street	Office	199,500	sf
8	Apartments	5900-6040 W. Center Dr.	Apartments	545	du
9	Private Elementary School	5400 S. Beethoven Street	School	260	stu
10	LMU Master Plan	1 LMU Drive	Update to LMU Master Plan	--	--
11	Playa Vista Phase I	Jefferson Boulevard, between Lincoln Boulevard and Centinela Avenue	Apartments Office Retail Community Serving	89 349,000 14,000 92,500	du sf sf sf
12	Playa Vista Plant Site (Spruce Goose)	Campus Center Drive / Bluff Creek Drive	Production and Staging Support Office	1,129,900 572,050	sf sf
13	Playa Vista Phase II – The Village at Playa Vista	Jefferson Boulevard / Westlawn Avenue	Apartments Office Retail Community Serving	230 50,000 -- 19,000	du sf sf sf
14	Commercial/Retail	5450 Sepulveda Boulevard	Retail	14,000	sf
15	Entrada Office Tower	6161 W. Centinela Avenue	Office	342,409	sf
16	Grosvenor Court	5550 Grosvenor Boulevard	Condominiums	215	du
17	Airport Marina Ford/Honda	6002 Centinela Avenue	Auto Service	26,284	sf
18	Office	700 Corporate Pointe	Office	281,000	sf
19	Commercial Retail Building	5446 Sepulveda Boulevard	Retail	13,600	sf
20	Apartments	8740 La Tijera Boulevard	Apartments	137	du
21	Boutique Hotel	11469 Jefferson Boulevard	Hotel	183	rooms

Notes: sf = square feet; du = dwelling units

[a] *Related Project No. 1 through 13, and 20 are located in the City of Los Angeles.*

[b] *Related Project No. 14 through 19, and 21 are located in the City of Culver City.*

[c] *In May 2018 an entitlement for this property was approved for the construction of a transit oriented mixed use project with 87 dwelling units and 882 sf of commercial uses (Case No. DIR-2017-1735-TOC-SPR). As the vehicle trips associated with the restaurant would exceed that of the proposed 87 unit TOC mixed-use affordable housing project, the Traffic Impact Study presents a conservative analysis.*

Source: The Mobility Group, 6711 Sepulveda Project Traffic Study, September 20, 2017.

Source: The Mobility Group, August 8, 2017.

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Figure II-19
Location of Related Projects

II. PROJECT DESCRIPTION
C. ENTITLEMENT REQUESTS

Hanover R.S. Limited Partnership ("Applicant") is requesting that the following entitlement be granted by the City of Los Angeles as the designated lead agency:

- Density Bonus Compliance pursuant to Los Angeles Municipal Code ("LAMC") Section 12.22 A.25 to permit new construction of a 180-unit apartment building utilizing a 35% Density Bonus, including 11% Very Low Income Housing Units with the following on-menu incentives:
    - An increase in Floor Area Ratio ("FAR") pursuant to LAMC 12.22 A.25(f)(4)(ii) for a maximum FAR of 3:1 in lieu of the otherwise permitted 1.5:1 FAR.
    - A 20% decrease in open space required pursuant to LAMC 12.22 A.25(f)(6) for a minimum requirement of 15,540 square feet of total usable open space in lieu of the otherwise required 18,425 square feet of total usable open space;

- Site Plan Review pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of 180 residential units and 210 on-site parking spaces; and

- A Waiver of Dedications and Improvements to seek relief from a street dedication and improvement required on Arizona Street.

The Applicant would also request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities which may include, but are not limited to, the following: demolition, excavation, shoring, grading, foundation, haul route (for the export of approximately 20,000 cy of soil), and building construction for the Project Site. Related approvals (as needed), ministerial or otherwise, such as approval of a haul route, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project. Other responsible governmental agencies may also serve as a responsible agency for certain discretionary approvals associated with the construction process, which include, but are not limited to the South Coast Air Quality Management District (construction-related air quality emissions) and the Regional Water Quality Control Board, Los Angeles Region (construction-related water quality).

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387). Unless otherwise noted, the thresholds of significance are based on the City of Los Angeles' *L.A. CEQA Thresholds Guide.*

I. AESTHETICS

Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743),[1] which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the *L.A. CEQA Thresholds Guide (2006).*

Based on the criteria set forth above the Proposed Project is a residential project located on an infill site within a Transit Priority Area as defined by CEQA. The Project Site is located within ½ mile (walking distance) of numerous bus routes with peak commute service intervals of 15 minutes or less at the intersection of Centinela Avenue and Sepulveda Boulevard, located approximately 0.13 mile north of the Project Site. The Project Site is served by several bus routes including two Metro bus lines: 110 and 217; LADOT Community Express line 574; and Culver City bus lines: Rapid Route 6R, local Route 6, and local Route 3. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not

[1] *SB 743 is codified as Public Resources Code Section 21099.*

affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

The following discussion is therefore provided for informational purposes only.

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

Less Than Significant Impact. For other projects where Public Resources Code Section 21099 is not applicable, the *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if the proposed project includes a proposal to develop or allow development in an existing natural open space area or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is currently developed with a self-storage facility and associated surface parking lot. The Proposed Project would include the demolition/removal of the existing structure to allow for the development and operation of an eight-story residential building with two levels of subterranean parking levels, with a maximum height of 91 feet above grade and a flat roof elevation of 130 feet above mean sea level (MSL). The Project Site increases in elevation and slopes to the southwest. Views in the vicinity of the Project Site are largely constrained by adjacent structures and the abutting elevated bluff. No locally designated or protected scenic views are provided from or through the Project Site. The Proposed Project is located in a predominately commercial and residential area of the Westchester – Playa del Rey Community Plan area and would not block or detract from the existing valued aesthetic quality of a scenic vista. . As such, the Proposed Project would not have a substantial adverse effect on a scenic vista, and a less than significant impact would occur.

As discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. Therefore, the Proposed Project's potential to result in a substantial adverse impact upon the environment is less than significant.

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

No Impact. For other projects where Public Resources Code Section 21099 is not applicable, the *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if scenic resources would be damaged and/or removed by development of a project. As discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. Moreover, the Project Site is not bordered by or within immediate vicinity of a designated

scenic highway as identified in the Mobility Element of the City of Los Angeles General Plan.[2] The existing on-site building is not listed on the National Register, California Register, or local listing.[3] There are no unique geologic features, native vegetation, or trees that are protected under the City of Los Angeles Protected Tree Ordinance (Ord. No. 177,404). Thus, the Proposed Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

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

Less Than Significant Impact. For other projects where Public Resources Code Section 21099 is not applicable, the *L.A. CEQA Thresholds Guide* provides that a significant impact may occur if the Proposed Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

The Proposed Project would be required to comply with all applicable building code requirements, including Los Angeles Municipal Code (LAMC) Section 91.8104, which requires every building, structure, or portion thereof, to be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. In addition, the removal of graffiti is required pursuant to LAMC Section 91.8104.15, which requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. Pursuant to Section 91.6205 of the LAMC, the Applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The LAMC also requires the Applicant to be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence. Thus, with adherence to these regulatory codes and compliance measures, impacts related to the general aesthetic appearance, upkeep, and character of the Project Site would be less than significant.

Building Heights and Massing

The scale and character of the area immediately surrounding the Project Site ranges from low-rise to high-rise buildings with the following land uses: single-family residential uses, industrial uses, commercial uses, and undeveloped land. Low-rise to mid-rise commercial buildings and hotels are located along Sepulveda Boulevard to the north of the Project Site. The Promenade at Howard Hughes Center is located to the east of the Project Site, which include mid-rise to high-rise commercial and office buildings. A proposed five-

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

[3] *City of Los Angeles, Los Angeles Historic Resources Inventory Search, website: http://www.historicplacesla.org/search, accessed October 2017. See also, response to Checklist Question No. V, Cultural Resources.*

story multi-family building is located to the immediate south. Single-family residences are located further south and southwest of the Project Site, which are located at a higher elevation than the Project Site on top of a bluff. Low-rise manufacturing facilities are located to the northwest of the Project Site fronting Arizona Avenue. The proposed eight-story multi-family residential building would not be out of character with the surrounding land uses. The diverse availability of housing would enhance the residential character and integrity of the surrounding neighborhoods by replacing a currently underutilized site with a new residential building that would transition the single-family neighborhood to the south/southwest with the surrounding commercial uses to the north and east. As such, the Proposed Project's impacts with respect to building height would therefore be less than significant.

With regards to the Proposed Project's massing, the Proposed Project utilizes multiple materials that would visually break up the building's massing and contribute to an intricate design. The fourth floor would include a step-back to incorporate an amenity deck along the western property line. A skydeck would be provided on the eighth level on the northeast corner of the Project Site. The proposed building's design, architectural materials, and landscaping would serve to visually break up the Proposed Project's massing. Additionally, the Proposed Project would be designed to comply with applicable design guidelines, which would ensure that the Proposed Project is visually compatible with the surrounding land uses. As such, the Proposed Project would result in a less than significant impact with regards to massing.

Shade/Shadow

Building shadow is a general condition of the urbanized environment, and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. In accordance with the *L.A. CEQA Thresholds Guide*, "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort of commerce. Pursuant to the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if the Proposed Project's structures cast shadows on a shadow sensitive land use for more than three hours each day between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October.

The Project Site is surrounded by a two-story commercial building to the south that is proposed for a five-story multi-family residential development. An undeveloped hill is located further south with single-family residential neighborhoods to the south and southwest, industrial uses to the northwest, and commercial uses to the north and east. The identified shadow sensitive receptors surrounding the Project Site include the single-family residences. The surrounding residential neighborhoods are located on the abutting hilltop at a higher elevation than the Project Site. Although the surrounding single-family residences may contain shadow-sensitive features such as solar panels, outdoor courtyards, pool areas or south facing balconies, the Proposed Project's shadow envelope would have little effect on such features due to the elevation of these residential neighborhoods relative to the height of the proposed building, and the location of the residential neighborhood relative to the Project Site. Therefore, the Proposed Project's shade and shadow

impacts would have little impact on any surrounding shadow sensitive land uses, and impacts would be less than significant.

As discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment.

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

Less Than Significant Impact. For other projects where Public Resources Code Section 21099 is not applicable, the *L.A. CEQA Thresholds Guide* provide that a significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Proposed Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

Nighttime lighting for the Proposed Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas largely to provide adequate nighttime visibility for residents, guests, and visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. To ensure that lighting sources are not directly visible by adjacent properties, the Proposed Project's lighting fixtures would be installed and operated in accordance with 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). The Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Therefore, potential impacts relating to lighting would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. The Proposed Project is located in a highly urbanized and developed area, the Proposed Project's architectural materials and landscaping would prevent unnecessary glare. The landscaped courtyards and green areas would serve to reduce the building's heat gain and reflective glare potential. The Proposed Project is located in an urbanized and developed area, and would not introduce any new substantial sources of glare that are

incompatible with the surrounding areas. Therefore, the Proposed Project's potential impacts related to glare would be at a less than significant level.

As discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. The Proposed Project would conform to all applicable LAMC and Building Code requirements pertaining to light and glare, including LAMC Sections 12.21 A 5(k), Sec. 93.0117, and Sec. 14.4.4-E, which provide standards for controlling lighting and illumination from exterior stationary light sources, lighting within parking areas, and signage illumination. As such, aesthetic impacts related to light and glare would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The application of Public Resources Code Section 21099 provides that the aesthetic impacts of a residential project, such as the Proposed Project, on an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Development of the Proposed Project in conjunction with the 21 related projects would result in an intensification of existing prevailing land uses in the transit priority area within the Westchester-Playa del Rey Community in the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval, as may be applicable. The site plan review process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The Project Site is located in a highly developed area of the Westchester-Playa del Rey Community in the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for

listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] Therefore, under current analysis, no impact to agricultural lands would occur.

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

No Impact. The Project Site is located within the Westchester-Playa del Rey Community Plan area of the City of Los Angeles. The Project Site is zoned C4-1 and has a land use designation of General Commercial. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[5] Therefore, no impact would occur.

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

No Impact. The Project Site is located within the Westchester-Playa del Rey Community Plan area of the City of Los Angeles. The Project Site is zoned C4-1 and has a land use designation of General Commercial. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is located in an urbanized area within the City of Los Angeles. The Project Site is zoned C4-1 and has a General Plan land use designation of General Commercial in the Westchester-Playa del Rey Community Plan area. A vacant self-storage facility and its associated parking lot are located on the Project Site. The Project Site is not zoned as forestland or agriculture land. Therefore, no impact would occur with respect to loss of forest land.

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

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site

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[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed October 2017.*

[5] *California Department of Conservation, State of California Williamson Act Contract Land Map 2015-2016, website: http://www.conservation.ca.gov/dlrp/lca, accessed October 2017.*

are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[6] Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the 21 related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[7] The Project Site is located in an urbanized area in the Westchester-Playa del Rey Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

III. AIR QUALITY

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

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 ("2016 AQMP"). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. In addition, the Southern California Association of Governments (SCAG) recently approved its 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and State Implementation Plan (SIP) for the South Coast Air Basin ("Basin"), are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP,

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6 *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed October 2017.*

7 *Ibid.*

since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Section XIII(a), Population and Housing, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development within a half of a mile (walking distance) of several Metro, LADOT, and Culver City bus lines that connect to all regions of the Los Angeles area. Thus, the Project's location provides opportunities for residents and guests to use public transit to reduce vehicle trips. The Project Site is also located in a Transit Priority Area as defined by Public Resources Code Sections 21099 and 21064.3. Reports by the California Department of Transportation and SCAG have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption.[8,9] As discussed in the Project's Traffic Study (See Appendix G of this MND), the Proposed Project's close proximity to other commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS, as detailed in Section XIII(a), Population and Housing, and Section VII, Greenhouse Gas Emissions, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2020. This construction timeline schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) excavation and grading;

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[8] *California Department of Transportation, California Transportation Plan 2040, June, 2016, website: http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf, accessed October 2017.*

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

(3) building construction; and (4) architectural coating/finishing. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

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

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
    - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    - Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table III-1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development.

As shown in Table III-1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Table III-1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition / Site Clearing						
On-Site Fugitive Dust	--	--	--	--	0.94	0.14
On-Site Off-Road (Diesel Equipment)	3.00	28.28	18.83	0.03	1.70	1.61
Off Site (Hauling, Vendor, Worker)	0.21	4.07	1.49	0.01	0.44	0.13
Total Emissions	***3.21***	***32.35***	***20.32***	***0.04***	***3.08***	***1.88***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading / Excavation						
On-Site Fugitive Dust	--	--	--	--	2.06	1.12
On-Site Off-Road (Diesel Equipment)	1.79	20.16	10.04	0.02	0.94	0.87
Off Site (Hauling, Vendor, Worker)	0.59	18.15	4.08	0.05	1.32	0.41
Total Emissions	***2.38***	***38.31***	***14.12***	***0.07***	***4.32***	***2.40***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	4.06	28.74	25.12	0.04	1.79	1.75
Off Site (Hauling, Vendor, Worker)	1.11	4.70	8.60	0.03	2.10	0.59
Total Emissions	***5.17***	***33.44***	***33.72***	***0.07***	***3.89***	***2.34***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	11.70	--	--	--	0.00	0.00
On-Site Off-Road Diesel Equipment	1.84	13.81	15.57	0.02	0.87	0.86
Off-Site Hauling/Vendor/Worker Trips	0.16	0.11	1.21	<0.01	0.37	0.10
Total Emissions	***13.70***	***13.92***	***16.78***	***0.02***	***1.24***	***0.96***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

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

Operational Emissions

Existing Emissions

The Project Site is developed with a former self-storage facility. The building was recently vacated in January 2017, which serves as a temporary condition. The building still remains occupiable without requiring any discretionary permits. This existing use analysis is therefore based on historical operations and serves as the existing conditions baseline. The existing use generates air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic

traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*). As shown in Table III-2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table III-2
Existing Daily Operational Emissions from Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area	0.42	<0.01	<0.01	0.00	<0.01	<0.01
Energy	0.01	0.09	0.08	<0.01	<0.01	<0.01
Mobile (Vehicle) Sources	0.29	1.43	4.36	0.01	0.91	0.25
Total Emissions	***0.72***	***1.52***	***4.44***	***0.01***	***0.91***	***0.25***
Wintertime (Non-Smog Season) Emissions						
Area	0.42	<0.01	<0.01	0.00	<0.01	<0.01
Energy	0.01	0.09	0.08	<0.01	<0.01	<0.01
Mobile (Vehicle) Sources	0.28	1.48	4.06	0.01	0.91	0.25
Total Emissions	***0.71***	***1.57***	***4.14***	***0.01***	***0.91***	***0.25***
Note: Calculation worksheets are provided in Appendix A to this IS/MND.						

Proposed Project Emissions

The Proposed Project would result in the demolition of the existing self-storage facility and the development of a multi-family residential building with 180 dwelling units. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table III-3, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table III-3
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area	3.95	0.17	14.92	<0.01	0.08	0.08
Energy	0.05	0.42	0.18	<0.01	0.03	0.03
Mobile Sources	2.01	10.18	27.11	0.09	7.31	2.02
Total Project Emissions	**6.01**	**10.77**	**42.21**	**0.09**	**7.42**	**2.13**
Less Existing Project Site Emissions	*-0.72*	*-1.52*	*-4.44*	*-0.01*	*-0.91*	*-0.25*
NET Project Emissions	**5.29**	**9.25**	**37.77**	**0.08**	**6.51**	**1.88**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area	3.95	0.17	14.92	<0.01	0.08	0.08
Energy	0.05	0.42	0.18	<0.01	0.03	0.03
Mobile Sources	1.92	10.41	25.38	0.09	7.31	2.02
Total Project Emissions	**5.92**	**11.00**	**40.48**	**0.09**	**7.42**	**2.13**
Less Existing Project Site Emissions	*-0.71*	*-1.57*	*-4.14*	*-0.01*	*-0.91*	*-0.25*
NET Project Emissions	**5.21**	**9.43**	**36.34**	**0.08**	**6.51**	**1.88**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculation worksheets are provided in Appendix A to this IS/MND.
Parker Environmental Consultants, 2017.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

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

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

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

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[10]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[11] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 3, which covers the Southwest Los Angeles County Coastal area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the Project Site is approximately 1.23 acres, the one-acre LSTs were applied for the Proposed Project as a conservative estimate because one-acre LST's are more stringent than a project site with size of 1.23 acres or two acres. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are the single-family residences in the neighborhoods to the south and southwest of the Project Site, which are located approximately 65 meters from the Project Site. Additionally, the proposed residential building to the immediate south may be occupied with future residents during the construction of the Proposed Project, which may experience localized emissions. Figure III-1, below, shows the nearest air quality sensitive receptors to the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a one-acre site with receptors located within 25

[10] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*
[11] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

meters was used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

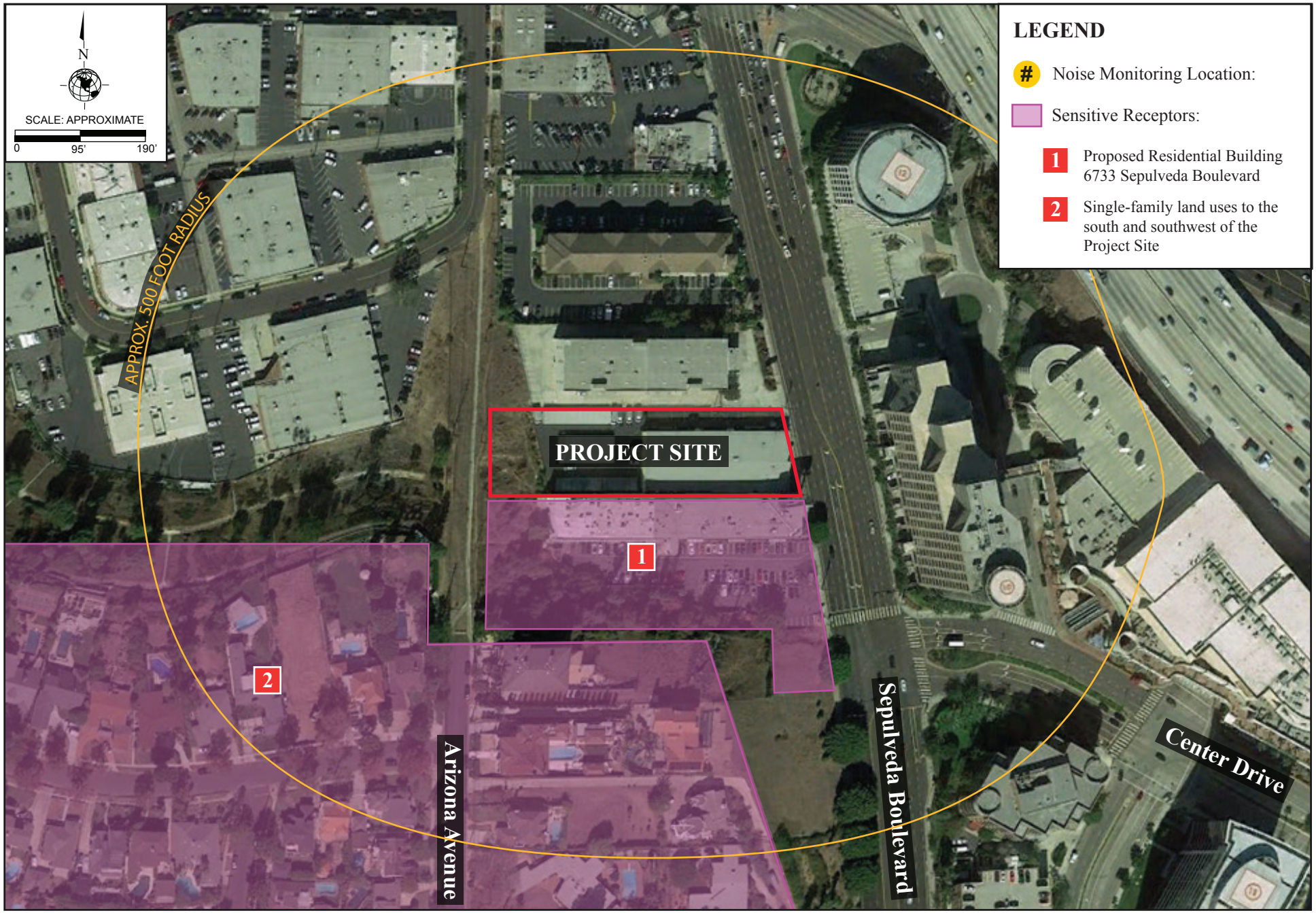
Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table III-4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 3. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table III-4
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition / Site Clearing	28.28	18.83	2.64	1.75
Excavation and Grading	20.16	10.04	3.00	1.99
Building Construction	28.74	25.12	1.79	1.75
Architectural Coatings	13.81	15.58	0.87	0.86
SCAQMD Localized Thresholds [c]	**91**	**664**	**5**	**3**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

Notes:
[a] *The localized thresholds for all phases are based on a receptor within a distance of 25 meters in SCAQMD's SRA 3 for a Project Site of one acre.*
[b] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*
[c] *SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009.*
Source: CalEEMod 2016.3.2, Calculation worksheets are provided in Appendix A to this IS/MND.



Source: Google Earth Base Map, 2016.

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Figure III-1
Air Quality Sensitive Receptors

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). Historically, the SCAQMD has suggested conducting a CO hotspot analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on a review of the Project's Traffic Study, none of the 15 study intersections would meet these criteria for the "Existing with Project" and "Future with Project" conditions. Additionally, the Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, the Proposed Project's mobile source emissions at the 15 study intersections would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. Thus, since the volumes at the 15 study intersections would not exceed the traffic volumes modeled at the four highest travelled intersections in the Basin, it can be concluded that the Proposed Project would not result in a significant localized CO Hotspot impact. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

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

Operational Emissions

The Proposed Project consists of a multi-family residential development. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from Proposed Project implementation**.** In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Proposed Project would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Therefore, potential operational odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 21 related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles and Culver City.

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

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed

utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question III (c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

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

IV. BIOLOGICAL RESOURCES

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently developed with a self-storage facility and its associated surface parking and 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, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. As stated in the Tree Report (see Appendix B of this IS/MND), vegetation on the Project Site is limited to one tree along the eastern property line, an eastern red cedar tree. This on-site tree is not designated as a protected tree.[12] Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected trees.

[12] *Thomas N. Masters II, Tree Survey Report, 6711 S. Sepulveda Boulevard, Los Angeles, California 90045, July 29, 2017. (Appendix B to this IS/MND)*

While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Section 3503 of the California Department of Fish and Game Code. To ensure compliance with the MBTA, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. Thus, compliance with the MBTA would ensure the Proposed Project would have a less than significant impact on sensitive biological species or habitat.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a highly urbanized area within the Westchester-Playa del Rey Community Plan area. The Project Site is currently developed with a self-storage facility and its associated surface parking lot. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, development of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is currently developed a self-storage facility and its associated surface parking lot. The Project Site does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above), and no impacts to riparian or wetland habitats would occur with the development of the Proposed Project.

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

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

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project would be inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance (No. 177,404). As stated above, the Project Site is currently developed with a self-storage facility and its associated surface parking lot. As stated in the Tree Report (Appendix B of this IS/MND), there is one tree (eastern red cedar) located on-site along the eastern property line, and no trees are located in the public right-of-way. The proposed on-site tree to be removed is not protected under a policy or ordinance.[13] Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. As such, the Proposed Project would not conflict with a policy or ordinance protecting biological resources and impacts would be less than significant.

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

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

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with mitigation. Development of the Proposed Project in combination with the 21 related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or

[13] *Thomas N. Masters II, Tree Survey Report, 6711 S. Sepulveda Boulevard, Los Angeles, California 90045, July 29, 2017. (Appendix B to this IS/MND)*

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, Federal Migratory Bird Treaty Act, and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant.

V. CULTURAL RESOURCES

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[14]

Section 15064.5(b)(2) of the CEQA Guidelines provides that "[t]he significance of an historical resource is materially impaired when a project:

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

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

(c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

As previously stated, the Project Site consists of a vacant self-storage building and its associated surface parking lot. Based on the findings of a historic resources records search performed by the South Central Coastal Information Center (SCCIC), there are no historic resources on the Project Site.[15] Additionally, there are no known historical resources listed on the National Register, California Register, or as a Los Angeles Historic-Cultural Monument within 500 feet of the Project Site.[16,17] As such, the Proposed Project would have no impact upon historical resources and potentially historical resources.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources. The Project Site is located within an archaeological site and survey area, as delineated on the City's Prehistoric and Historic Archaeological Sites and Survey Areas Map.[18] Accordingly, a records search was conducted with the SCCIC to identify whether any known archaeological resources or archaeological survey areas occur on the Project Site. The SCCIC records search (dated December 1, 2017 and provided in Appendix K to this MND) identified no archaeological resources within the Project Site boundaries. However, four (4) archaeological resources occur within a ½-mile radius of the Project Site. The SCCIC records search further shows that one prior report/study included the Project Site area and 34 other reports/studies have been conducted within a ½ mile radius of the Project Site.

According to records evaluated by the SCCIC, the Project Site has not been subjected to any previous archaeological studies and the sensitivity of the Project Site is unknown. Although the Project Site is currently developed, there is the potential for the discovery of prehistoric and historic cultural resources within the project boundaries. While a majority of the Project Site is developed and capped with a building and associated surface parking lot, approximately 8,450 square feet of the westernmost portion of the site (comprising approximately 16 percent of the Project Site) is an exposed hillside. Based on a review of an Archaeological and Tribal Cultural Resources Assessment that was prepared by SWCA Environmental Consultants for the adjacent property located at 6733 Sepulveda Boulevard (See Appendix J to this IS/MND), there are no archaeological or Tribal Cultural Resources known to exist within the Project Site.

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[15] *See SCCIC Records Search Results for the 6711 Sepulveda Residential Project provided in Appendix K to this MND.*

[16] *City of Los Angeles, Los Angeles Historic Resources Inventory Search, website: http://www.historicplacesla.org/search, accessed October 2017.*

[17] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed October 2017.*

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

The project area has moderate potential for encountering intact prehistoric and historic Native American archaeological resources. The Archaeological and Tribal Cultural Resources Assessment for 6733 Sepulveda Boulevard details the City's regulatory compliance measures and best management practices for addressing inadvertent finds of archeological and tribal resources. These compliance measures and best management practices detail a specific protocol to be followed in the event that objects or artifacts that may be archaeological resources or Tribal Cultural Resources are encountered during the course of any ground disturbance activities, including but not limited to temporarily ceasing all earthwork activities in the area of the find until the potential archaeological and/or Tribal Cultural Resources are properly assessed by a qualified archaeologist. Implementation of these standard regulatory compliance measures would ensure that potential impacts to archaeological resources are reduced to a less than significant level.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded with the exception of the portion of undeveloped land. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.[19] This is further supported with correspondence with the Natural History Museum of Los Angeles County (dated November 14, 2017). The correspondence with the Natural History Museum states that there are no vertebrate fossil localities that lie directly within the Project Site boundaries. However, vertebrate fossil localities lie directly within the same sedimentary deposits that occur in the Proposed Project area. Refer to Appendix K.1 for the correspondence with the Natural History Museum of Los Angeles County and for descriptions of the nearby localities.

The correspondence identified that the northern portion of the Project area has surface deposits of younger Quaternary Alluvium, derived as alluvial fan deposits from the Baldwin Hills to the northeast and the Westchester Bluffs to the south. These deposits typically do not contain significant fossil vertebrate remains in the very uppermost layers, but older Quaternary deposits occur adjacent to the south at relatively shallow depth in the Proposed Project area and may well contain significant vertebrate fossils. Shallow excavations in the younger Quaternary Alluvium exposed throughout the Proposed Project area probably would not uncover significant vertebrate fossil remains. Deeper excavations that extend down into older Quaternary deposits, however, may well encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the Project Site area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples from the Project Site should be collected and processed to determine the small fossil potential of the Project Site. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

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

The Proposed Project proposes one level of subterranean parking. As such, there is a potential for paleontological resources to be uncovered during the grading and foundational activities of the Proposed Project. If paleontological resources are discovered, pursuant to the City's regulatory compliance measures and best management practices for grading activities, 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. With adherence to these regulatory compliance measures, potential impacts to paleontological resources would be reduced to less than significant levels.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant impact could occur if grading or excavation activities associated with a proposed project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could be discovered on the Project Site. In the event that human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- 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 Native American Heritage Commission (NAHC).
- The NAHC will 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.

Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the other 21 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization

of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate regulatory compliance measures. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. GEOLOGY AND SOILS

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

The following section summarizes and incorporates the reference information from the Geotechnical Design Report, Proposed Multi-Family Development, Assessor Parcel Number 4110001004, 6711 S. Sepulveda Boulevard, Los Angeles, California, prepared by Group Delta Consultants, Inc., dated October 23, 2017, ("Geotechnical Report"). The Geotechnical Report is included as Appendix C to this IS/MND.

a) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

Based on Group Delta's review of available published geologic maps, there are no mapped active faults that cross through or project toward the Project Site. The Project Site is not within an Alquist-Priolo Special Study Fault Zone and is not within a City of Los Angeles Preliminary Fault Study Area (NavigateLA). The Project Site is located within a City of Los Angeles, Safety Element, Fault Rupture Study Area. Discussions with the City of Los Angeles Geologist indicate that the Fault Rupture Areas identified in the Safety Element are not necessarily areas identified to have surface fault rupture, but rather related to planning of emergency response facilities. Therefore, the potential for surface fault rupture at the Project Site is low. Furthermore, the Proposed Project would not exacerbate any existing surface fault conditions. Compliance

with existing state and local regulations, including the California Building Code and the Los Angeles Building Code (LABC) to the satisfaction of the Department of Building and Safety, would ensure the Proposed Project is consistent with applicable seismic design criteria and with existing seismic safety regulations. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, project impacts would be less than significant.

b) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by bringing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

Although there are no mapped active faults that cross through the Project Site, and the Project Site is not within an Alquist-Priolo Special Study Fault Zone area, the Project Site is located within the seismically active area of southern California and there is a high potential for the Project Site to experience strong ground shaking from local and regional faults. These hazards and their potential impact can be mitigated with proper seismic design. The intensity of ground shaking is highly dependent upon the distance of the fault to the Project Site, the magnitude of the earthquake, and the underlying soil conditions.

The closest active fault is the Newport-Inglewood Fault Zone, which is about 2.1 miles east of the Project Site. The Newport-Inglewood Fault is a northwest trending strike-slip fault capable of generating a M7.2 earthquake with an estimated slip-rate of 1.0-5.0 mm/yr. Segments along this fault zone east of the Project Site are identified under the CGS Alquist-Priolo Earthquake Fault Zone Act. Blind thrust faults (BTF) near the Project Site include the Compton and Puente Hills. The Compton BTF surface projection is about 10 miles west of the Project Site. It dips gently to the east, deep below the surface of the Project Site. The Project Site is considered within the hanging wall of this fault. It is capable of producing a M6.9 earthquake with an estimated slip rate of 0.9 (Dawson and Weldon, 2012). The Puente Hills BTF is located approximately 5.0 miles east of the Project Site, and is capable of generating a M7.0 earthquake. The Puente Hills fault is considered a source for the Whittier Narrows M5.3 and 5.9 earthquakes in 1987. The closest mapped faults are the Charnock and Overland faults. The Charnock fault is located about 0.45 miles west of the Project Site, trending north-northwest and the Overland fault is located about 0.43 miles east of the Project Site, trending northwest. Both faults are considered potentially active strike-slip faults.

The Proposed Project would construct a new residential building, thereby increasing the number of residents and guests on-site. Therefore, additional people and structures would be exposed to potential adverse effects from ground shaking than under existing conditions. However, as with any new proposed development, the Proposed Project would be required to adhere to current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and design recommendations set forth in the

Geotechnical Report as well as the recommendations provided in the final design-level geotechnical report that will be required by the City's Department of Building and Safety prior to the issuance of the Proposed Project's grading and building permits to ensure that the proposed structure may withstand typical seismic ground shaking and seismically induced settlement. In addition, geotechnical evaluations of the Proposed Project would follow the guidelines presented in CGS *Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California,* which provides guidance for evaluation and mitigation of earthquake-related hazards (other than fault rupture). Thus, with compliance with the regulatory compliance measures, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. Project impacts would be less than significant.

c) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a Project Site is located within a liquefaction zone. Three simultaneous conditions are required for liquefaction to occur: (1) cohesionless soils of loose to medium density; (2) saturated conditions; and (3) rapid, large strain, cycling loading, normally induced by earthquake motions.

The Project Site is not within an area identified as susceptible to liquefaction according to the City of Los Angeles Safety Element[20] or the City's Zoning Information and Map Access System (ZIMAS).[21] The Geotechnical Report concluded that the Project Site is not located in the zone of required investigation for liquefaction based on the seismic hazard zone map for the Venice 7.5-Minute Quadrangle (CDMG, 1999).[22] The subsurface conditions encountered during the field investigation indicate a predominately dense to very dense soil profile consisting of sand and silty sand underlying the historic high groundwater level. Therefore the liquefaction potential at the Project Site is considered low. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with liquefaction, and the Proposed Project would not exacerbate existing conditions with regard to liquefaction. As such, potential impacts associated with liquefaction would be less than significant.

d) Would the project exacerbate existing hazardous environmental conditions by bringing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or exacerbate existing

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[20] *City of Los Angeles, Department of City Planning, ZIMAS, website: http://zimas.lacity.org/, accessed: October 2017.*

[21] *City of Los Angeles, Department of City Planning, General Plan Safety Element, Safety Element Exhibit A: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, March 1994.*

[22] *State of California, Department of Conservation, Venice Quadrangle Seismic Hazard Zone Map, March 25, 1999.*

hazardous environmental conditions by bringing people to substantial risk of injury. A project-related significant impact may occur if the Project Site is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The west portion of the Project Site includes the lower portion of a 45-foot high, 1.5:1 ascending slope. No history of landsliding is mapped within the slope according to the CGS online inventory and regional geologic mapping. An earthquake induced landslide hazard zone has been mapped along the slope outside of the Project Site property. According to the Seismic Hazard Zone Report for the Venice Quadrangle (CGS, 1998), slopes at inclinations of 1.5:1 comprised of older alluvium (Qoa) have a very low earthquake induced landslide hazard. The slope is comprised of an older alluvial terrace deposit (Qoa) overlying Pleistocene San Pedro Sands (Qsp). In areas where the slope is over steepened, significant surficial slumping was evident during the Site preliminary reconnaissance on March 15, 2017, performed by Group Delta's Certified Engineering Geologist. Scarps extend just below the top of slope and slumped material has collected along the west property line mid-slope, and pushed the chain link fence at least four feet down slope.

It is understood that the proposed plans would cut and fill to level a significant portion of the existing slope. The remaining slope areas would be 2:1 or less steep in inclination. A cut retaining wall up to 30 feet in height would support the ascending slope to the west, north, and south of the proposed pool deck. A fill retaining wall up to 30 feet in height would support the north and south portion of the pool deck. A below grade wall would support the deck to the east. Any potential slope hazard would be mitigated through retaining wall design. The recommendations for design of retaining walls are provided in the Geotechnical Report. Slopes to remain ascending from the west and south retaining walls have the potential for surficial sloughing. Drains should be designed and maintained along the top of wall to collect any potential erosion of exposed slopes. Proper drainage on the slope should also be designed to prevent surficial slope instability.

The design and construction of the Proposed Project shall conform to the recommendations and guidelines stated in the Geotechnical Report to the satisfaction of the Department of Building and Safety. Additionally, impacts would result from the alteration of natural landforms due to extensive grading activities. However, this impact would be mitigated to a less than significant level by designing the grading plan to conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Prior to the issuance of grading or building permits, the Applicant will be required to submit the Geotechnical Design Report, prepared by a Group Delta Consultants, Inc., to the Department of Building and Safety, for review and approval. The Geotechnical Report assesses the potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and recommends measures that may include building design consideration. Building design considerations include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The Project will be required to comply with the conditions contained within the Geology and Soils Report

Approval Letter as approved by the Department of Building and Safety for the Proposed Project, and as it may be subsequently amended or modified.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Construction

Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. As discussed above, Group Delta proposes grading guidelines for grading of the Project Site and the slope between the proposed retaining wall and the property line. The design and construction of the Proposed Project shall conform to the recommendations and guidelines stated in the Geotechnical Report and the Geology and Soils Approval Letter to the satisfaction of the Department of Building and Safety.

All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The application of BMPs includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. Furthermore, the grading plan shall conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during the construction phase.

Operation

The Project Site would be mostly paved-over or built upon, so little soil would be exposed. However, the erosion from the adjacent hill must be considered in the design of the retaining walls around the proposed

pool deck. The recommendations for design of retaining walls are provided in the Geotechnical Report. Accordingly, compliance with the conditions identified in the Department of Building and Safety Soils Approval Letter, would ensure impacts associated with soil erosion and loss of topsoil during the operation of the Proposed Project would be mitigated to less than significant levels.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Project Site is not within a liquefaction zone and is not located in an area susceptible to liquefaction or collapse. The Geotechnical Report identified that an earthquake induced landslide hazard zone has been mapped along the slope outside of the Project Site. The Proposed Project would adhere to the conditions of the grading and building permits approved by the LADBS to ensure that the Proposed Project would not exacerbate existing landslide hazard conditions. The Geotechnical Report concluded that the Proposed Project can be supported on shallow foundations, provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. The Proposed Project shall also design the grading plan to conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. Accordingly, compliance with the conditions identified in the Department of Building and Safety Soils Approval Letter would ensure impacts associated with unstable geologic unit or soils would be mitigated to less than significant levels.

g) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Report determined the on-site soils have a medium expansion potential. Since the soils are not highly expansive, no removal or replacement of the soils with non-expansive soils is necessary. Reinforcing beyond the recommendations in the Geotechnical Report and minimum required by the City of Los Angeles Department of Building and Safety is not required. Accordingly, impacts associated soil expansion would remain less than significant.

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

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

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any of the 21 related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate regulatory compliance measures and mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that with compliance with the regulatory compliance measures and implementation of applicable mitigation measures listed above, potential Proposed Project impacts would be reduced to less than significant levels. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

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

California Global Warming Solutions Act of 2006

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

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level

approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[23] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

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

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[24] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In October 2017, CARB published and circulated a revised draft version of "The 2017 Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The Revised Draft 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

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

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

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

Cap-and-Trade Program

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

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

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State- mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis. The Proposed Project would implement the 2016 CALGreen Code (effective January 1, 2017) and any future additional construction activities necessary.

City of Los Angeles Sustainable City pLAn

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

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New development projects are required to comply with the *L.A. Green Building Code,* and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including SB 32.

2016 RTP/SCS

On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016 RTP/SCS

concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

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

Less Than Significant Impact. The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a residential project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The Guidelines do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions. A significant impact would occur if a project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016 RTP/SCS, and the LA Green Building Code.

Construction

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

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table III-5, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table III-5, the total GHG emissions from construction activities related to the Proposed Project would be 1,402.5 metric tons with the greatest annual emissions of 775.10 metric tons occurring in 2019.

Table III-5
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2018	392.99
2019	775.10
2020	234.41
Total Construction GHG Emissions	**1,402.50**

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

Operation

Baseline GHG Emissions

The Project Site is developed with a former self-storage facility that occupied the Project Site from late 2002 until January 2017. Although the self-storage facility was recently vacated in January 2017, this serves as a temporary condition. The building still remains occupiable without the need for any discretionary approvals. Thus, the existing use analysis is based on historical operations and serves as the existing conditions baseline. The operations of the commercial uses generate GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table III-6 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing commercial building at the Project Site. As shown in Table III-6, the existing operations on the Project Site generate approximately 380.80 CO^2e MTY.

Table III-6
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	<0.01
Energy	135.08
Mobile	196.36
Waste	11.75
Water	37.61
Total	**380.80**

Greenhouse gas emissions were estimated using CalEEMod Version 2016.3.2 Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Worksheets.

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project's compliance with the *L.A. Green Building Code* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. The Proposed Project's emissions were calculated using CalEEMod for a base project without the energy conservation measures mandated by the Green Building Code and with GHG reduction measures for purposes of quantifying the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table III-7, below, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Measures would be 2,705.40 CO_2e MTY, and the Project With GHG Reduction Measures scenario would result in a net increase of 2,031.40 CO_2e MTY.

For purposes of this comparison it should be noted that the Proposed Project's structural and operational features such as installing energy efficient lighting, low flow plumbing fixtures, and implementing an operational recycling program during the life of the Project would reduce the Project's GHG emissions by approximately 11 percent. When considering the fact that the Proposed Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., AB32, SB375, and SCAG's 2016 RTP/SCS growth strategy), the Proposed Project would realize a 25 percent reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use. The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project's compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32. In either case, the Proposed Project would not exceed the SCAQMD proposed non-industrial screening threshold of 3,000 $MTCO_2e$/year. While neither SCAQMD nor the City have adopted this screening threshold, the fact the Proposed Project's GHG emissions are below the threshold provides further substantial evidence that the Proposed Project's GHG impacts are less than significant.

Table III-7
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)		
	Base Project Without GHG Reduction Features	Proposed Project	Percent Reduction [a]
Area	3.11	3.11	0%
Energy (Electricity)	672.54	672.54	0%
Energy (Natural Gas)	89.06	89.06	0%
Mobile (Motor Vehicles)	1,705.27 [b]	1462.29	14%
Waste	41.64	20.82	50%
Water	147.03	117.63	20%
Construction Emissions [c]	46.75	46.75	--
Proposed Project Total:	**2,705.40**	**2,412.20**	**11%**
Less Existing Project Site:	-- [d]	*-380.80*	--
Proposed Project Net Total:	**2,705.40**	**2,031.40**	**25%**

Notes:
[a] *The Percent Reduction is not a quantitative threshold of significance, but shows the efficacy of the Project's compliance with the various regulations, plans and policies that have been adopted with the intent of reducing GHG emissions.*
[b] *Since the mobile trips already incorporates trip reductions, the GHG emissions prior to reductions was taken by multiplying the ratio of trips prior to reductions with net mitigated trips.*
[c] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
[d] *The existing emissions were not deducted from the Project Without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active commercial uses.*
Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Worksheets.

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

PDF-GHG-1 **Infill Development.** The Proposed Project is located on an infill site that is currently developed with commercial land uses and is located within a Transit Priority Area. The Proposed Project would include the demolition of the existing structure, which would off-set some of the Proposed Project's operational emissions. The Project is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

PDF-GHG-2 **Transit Priority Area.** The Proposed Project is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution

and energy consumption. The Proposed Project's close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone residential uses that are not located in close proximity to transit.

PDF-GHG-3 **Energy Conservation**. The Proposed Project must adhere to Title 24 2016 standards and include ENERGY-STAR appliances.

PDF-GHG-4 **Solid Waste Reduction Efforts**. California Green Building Code Section 4.408.1, imposes mandatory measures for residential projects that require developers to recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

PDF-GHG-5 **Water Conservation**. As mandated by the 2017 Los Angeles Green Building Code, the Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that implement water use reduction by complying with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 4.303.4.1 of Section 4.303.4 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 4.303.4.2 of the Plumbing Code's Section 4.303.4. The Proposed Project's water budget for landscape irrigation use shall conform to the California Department of Water's Resources' Model Water Efficient Landscape Ordinance (MWELO). Such landscape water reduction methods include, but are not limited to, use of captured rainwater, recycled water, graywater, or water treated for irrigation purposes and conveyed by a water district or public entity. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

PDF-GHG-6 **Electric Vehicle Supply Equipment.** In 2015, the City of Los Angeles amended the L.A. Green Building Code to incorporate requirements for the installation of electric vehicle charging equipment for new construction. Pursuant to LAMC 99.04.106.4, at least five percent (5%) of the Code required parking stalls shall be electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE). The incorporation of EVSE into the Proposed Project is consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips generated by the Proposed Project.

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

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

Plan Consistency

Consistency with AB 32 Scoping Plan

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

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

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

Green Building Strategy. The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing

inventory of buildings. The Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY Star rated appliances.

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

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

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with 2016-2040 RTP/SCS

The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Provide compact growth in areas accessible to transit;
- Provide jobs and housing closer to transit;
- Focus new housing and job growth in High Quality Transit Areas (HQTA); and
- Provide biking and walking infrastructure to improve active transportation options, transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a High Quality Transit Area (HQTA). The Project would provide residents with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would

further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

Consistency with L.A. Green Building Code

The L.A. Green Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, provide on-site storage for short and long term bicycle parking areas, and provide Energy-Star rated appliances were applicable. The Project would comply with these mandatory measures. Therefore, the Project is consistent with the L.A. Green Building Code.

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

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

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

Cumulative Impacts

Less Than Significant Impact. The GHG emissions from a residential project with up to 180 dwelling units is relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG emissions from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and

qualitative analysis) to determine the Proposed Project's contributing effect on global warming. As concluded above, the Proposed Project's generation of GHG emissions would represent a 25 percent reduction in GHG emissions with GHG reduction measures in place as compared to the Project's emissions in the absence of all of the GHG reducing measures and project design features. Furthermore, the Proposed Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

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 Proposed Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

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

- Phase I Environmental Assessment Report, 6711 S. Sepulveda Boulevard, Los Angeles, California 90045, prepared by Ecobility Corporation, dated July 19, 2017 ("Phase I ESA");
- Asbestos and Lead Comprehensive Hazardous Materials Survey Report, 6711 South Sepulveda Boulevard, Los Angeles, California, prepared by Advanced Environmental Group, Inc. ("AEG"), dated May 2017 ("Asbestos/Lead Inspection Report");
- Phase II Environmental Site Assessment for 6711 S. Sepulveda Boulevard, Los Angeles, California, prepared by Ecobility Corporation, dated July 21, 2017 ("Phase II ESA"); and
- Project Report for Methane Soil Gas Testing, 6711 South Sepulveda Boulevard, Los Angeles, California 90045, prepared by Environmental Support Technologies, dated May 19, 2017, ("Methane Report").

The Asbestos/Lead Inspection Report was commissioned by Ecobility Corporation to conduct a comprehensive hazardous materials survey of the Project Site in conjunction with the Phase I ESA. The Phase II ESA was conducted in conjunction with the Methane Report authorized to address the City of Los Angeles, Department of Building and Safety requirements. The Phase I ESA, Asbestos/Lead Inspection Report, Phase II ESA, and Methane Report are all included as Appendix E to this IS/MND.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a residential building with up to 180 multi-family dwelling units. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations.

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

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

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

Ecobility Corporation ("Ecobility") prepared a Phase I ESA for the Project Site. The purpose of the Phase I ESA was to evaluate the current and historical conditions of the Project Site in an effort to identify Recognized Environmental Conditions (RECs) in connection with the Project Site. A REC is defined by ASTM as: the presence of or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products even under conditions in compliance with laws. The

term is not intended to include de minimis conditions that generally do not present a material risk to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.

The scope of work in the Phase I ESA includes: 1) Tier 1 Vapor Encroachment Assessment; 2) review of Sanborn Maps, City Directories and EDR Database Report; 3) review topographic maps, aerial photographs and Site photographs; 4) interviews with regulatory officials and personnel associated with the Project Site and adjoining properties; 5) a Project Site visit; and 6) evaluation of information and preparation of the report provided herein.

The Project Site is occupied with a vacant two-story commercial building that was formerly EZ storage, a public storage facility. The facility has approximately 600 storage units. Asphalt parking areas are located along the north and west sides of the building.

Records Review

The review of City of Los Angeles Building & Safety permit records note the subject property was constructed in approximately 1955. The review of historic topographic maps and aerial photographs indicate the Project Site was vacant, undeveloped land from approximately 1896 to 1953. City Directories researched indicate the Project Site was occupied by General Sound Control Inc. in 1957 and 1958. Aerial photographs and topographic maps depict the current structure on the Project Site in 1963-1964. City Directories indicate various tenants from 1960 to 2014 and include: Electro Pulse (1960), Servo Corp. of America (1962), Winston Research Corp., a subsidiary of Fairchild Camera & Instrument Corporation (1964 to 1967), Computer Communication (1970), Fantastic Sound Inc. (1975) and EZ Storage (1980 to 2014).

Ecobility contracted Environmental Data Resources, Inc. (EDR) to conduct a search of Federal and State databases containing known and suspected sites of environmental contamination. The on-site property was not listed on any Federal, state, or local regulatory databases.

Burton Plating located at 6341 Arizona Circle is located approximately 1,200 feet to the northwest of the Project Site. The facility is listed on the Regional Water Quality Control Board (RWQCB) SLIC (Spills, Leaks, Investigations and Cleanups) database. The site is under the regulatory oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB) with known impacts to soil, soil vapor and groundwater with VOCs, specifically trichloroethylene (TCE), tetrachloroethene (PCE) and Freon. A Site Assessment Workplan has been submitted to the LARWQCB in March 2017 to further delineate and quantify VOCs in soil, groundwater and soil vapor on adjacent property to the northwest and southeast and conduct a groundwater investigation of the two uppermost aquifers beneath the site for the presence of VOCs. The proximity of Burton Plating is considered a vapor encroachment condition (VEC) to the Project Site.

Site Reconnaissance

The site reconnaissance was conducted on April 12 and April 25, 2017 by Ecobility Corporation staff.

Hazardous substances, petroleum products, underground storage tanks (USTs), and aboveground storage tanks (ASTs) were not identified or observed on the Project Site. Additionally, no suspect containers, interior staining, drains, polychlorinated biphenyl (PCB)s, solid waste dumping, wells, or stained soil or stressed vegetation were identified or observed on the Project Site during the site reconnaissance.

Findings

Within the scope of the Phase I ESA, Ecobility Corporation discovered evidence of recognized environmental conditions and other environmental issues in connection with the Project Site which are detailed below:

- A former experimental laboratory with an etching bath, a vapor degreaser and a vacuum plater was operated by a prior tenant (Winston Research Corp.) of the Project Site in the mid-1960s. According to permits reviewed the wastewater from the metal etching and parts washing was neutralized in a 3-stage clarifier and permitted to be discharged to the municipal sewer. The presence of an experimental laboratory and a former 3-stage clarifier is considered an REC to the Project Site.
- The review of City of Los Angeles Building & Safety permit records note the Project Site was constructed in approximately 1955. The review of historic topographic maps and aerial photographs indicate the Project Site was vacant, undeveloped land from approximately 1896 to 1953. City Directories researched indicate the Project Site was occupied by General Sound Control Inc. in 1957 and 1958. Aerial photographs and topographic maps depict the current structure on the Project Site in 1963-1964. City Directories indicate various tenants from 1960 to 2014 and include: Electro Pulse (1960), Servo Corp. of America (1962), Winston Research Corp., a subsidiary of Fairchild Camera & Instrument Corporation (1964 to 1967), Computer Communication (1970), Fantastic Sound Inc. (1975) and EZ Storage (1980 to 2014). The historic commercial and manufacturing tenant usage is considered an REC to the Project Site.
- The Project Site location within the City of Los Angeles Department of Building and Safety Methane Buffer Zone is considered an REC to the Project Site. The proposed building to be constructed will be equipped with a methane mitigation system and all occupied units will be above at least one level of vented parking.
- Burton Plating (6341 Arizona Circle) is located approximately 1,200 feet to the northwest. The site is under the regulatory oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB) with known impacts to soil, soil vapor and groundwater with VOCs, specifically TCE, PCE and Freon. A Site Assessment Workplan was submitted to the LARWQCB in March 2017 to further delineate and quantify VOCs in soil, groundwater and soil vapor on adjacent property to the northwest and southeast and conduct a groundwater investigation of the two uppermost aquifers beneath the site for the presence of VOCs. The proximity of Burton Plating is considered a VEC to the Project Site.
- Based on an Asbestos & Lead Comprehensive Hazardous Materials Survey Report prepared by Advanced Environmental Group, Inc. (AEG) for the Subject Property (May 2017), several building materials and paint samples were found to contain asbestos and lead was reported in several paint coating and metal flashing. The presence of lead and asbestos containing building materials is considered an REC to the Project Site. These materials will be appropriately handled and abated

prior to any scheduled demolition.

Asbestos-Containing Materials (ACMs)

Asbestos is a naturally occurring fibrous silicate material that was used for its high tensile strength, thermal insulation and chemical and thermal stability. The Occupation Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and vinyl flooring that are present in buildings constructed prior to 1981 and have not been appropriately tested are presumed asbestos-containing material (PACM).

Based on the Asbestos/Lead Inspection Report, AEG identified a total of eleven (11) suspect homogeneous building materials at the Project Site, two of which were inaccessible at time of the survey. Four (4) of the suspected building materials sampled, were found to contain asbestos, which includes a material previously sampled by CTL Environmental Services that was inaccessible to AEG at time of survey. One (1) homogeneous area is suspected to contain asbestos but was also inaccessible to AEG at the time of the survey.

Removal of ACM must be performed in accordance with all applicable federal, state and local health and safety regulation, such as U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403. AEG recommends that technical asbestos abatement specifications outlining industry standards specific to the project be prepared by a State of California Certified Asbestos Consultant (CAC) prior to bid solicitation. Independent third-party air monitoring should be provided by State of California CAC or Certified Site Surveillance Technician (CSST) during any future abatement to evaluate protection of site employees, sub-contractors, visitors and the Environment. With adherence to regulations compliance measures regarding proper disposal of ACMs, the Proposed Project would have a less than significant impact with respect to ACMs.

Lead-Based Paint (LBP)

Lead based paint (LBP) is defined as any paint, varnish, stain or other applied coating that has 1 mg/cm^2 (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead Based-Paint Hazard Reduction Act in 1992 also known as Title X, to protect families from exposure to lead from paint, soil and dust. Under Section 1017 of Title X, intact LBP on most walls and ceilings is considered a hazard although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. The USEPA and the U. S. Department of Housing and Urban Development (HUD) require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978.

Based on the age of the onsite structures (1955) there is a potential for the presence of LBP. Prior to any renovation, remodeling or demolition activities, all painted surfaces should be surveyed for the presence of lead-based paint (LBP). The potential presence of suspect LBP is considered another environmental concern to the Project Site.

Based on the Asbestos/Lead Inspection Report, AEG found out of seventy-four (74) paint measurements collected, ten (10) were above the limit of 0.7 mg/cm^2. The Vent penetration and electrical line conduit located on the roof were reported containing lead at 87 mg/cm^2 and 73 mg/cm^2, respectively. White and brown painted structural support beams were reported ranging from 0.9 – 1.3 mg/cm^2. Roll-up doorframes were reported ranging from 0.9 – 1.5 mg/cm^2. The yellow painted electrical panel was reported at 0.8 mg/cm^2. Two beige painted exterior doorframes were reported at 0.9 mg/cm^2 and 1.5 mg/cm^2, respectively. Two (2) out of five (5) samples contained lead levels above laboratory detection levels.

Any work involving the disturbance of these coatings, including, but not limited to, demolishing, drilling, sanding, and/or stabilization (wet scraping and coating with Lead Barrier Compound LBC™ or equivalent) of damaged, peeling, flaking and delaminating paints containing detectable levels of lead will be performed in accordance with all applicable federal, state and local health and safety regulation. To minimize occupational and environmental impact, loose and flaking paint should be stabilized/scraped and settled paint chips along the base of structures on hard or softscapes should be properly lifted, handled, stored, and disposed of. With adherence to regulatory compliance measures regarding proper disposal of LBP, the Proposed Project would have a less than significant impact with respect to LBP.

Subsurface Conditions

Due to the above findings, a Phase II ESA was prepared by Ecobility to obtain and present information about environmental conditions of subsurface soil, soil gas, and groundwater to assess acquisition and development of the Project Site and to assess the RECs identified in the Phase I ESA. The chemicals of concern (COCs) include VOCs and the seventeen Title 22 metals. The Phase II ESA was conducted in conjunction with a methane gas survey authorized to address the City of Los Angeles, Department of Building and Safety requirements. The scope of work included drilling thirteen soil borings, collecting and analyzing soil samples; installing soil-gas probes at 5 and 15 feet bgs, and in three locations 25 feet bgs; collecting and analyzing soil-gas samples for VOCs; and installing six groundwater wells to obtain information on the direction of groundwater flow and to collect and analyze groundwater samples for VOCs and Title 22 metals.

Methane

The Project Site is located within a City of Los Angeles Methane Zone. Properties within these zones require soil inspections prior to undergoing development. The Project Site is located approximately 1.4 miles west of the Potrero Oil Field as it has been mapped by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). Based on the proximity to the historic Playa del Rey and Inglewood Oil Field there is a potential hazard of methane gas in the subsurface soils. In accordance with the City of Los Angeles Municipal Code, Ordinance No. 175790 and Ordinance No. 180619 citywide methane mitigation requirements were established that include construction standards to control methane intrusion into buildings. Any proposed new building construction or paved areas located in the designated Methane Zone or Methane Buffer Zone must comply with Methane Mitigation Standards that require site testing of the subsurface soil for methane.

A Methane Survey was conducted by Environmental Support Technologies (EST) in May 2017 simultaneously with the Phase II ESA. The purpose of the Methane Survey was to assess whether methane is present beneath the Project Site to determine the level of Site Design as required by Division 71 of the Los Angeles Building Code. The Proposed Project is an eight-story residential structure with two levels of aboveground parking and one-level of subterranean parking. Based on conceptual plans, the estimated depth of the subterranean parking excavation is approximately 10 feet below ground surface (bgs).

Initial methane testing was performed using standard soil-gas testing procedures at eleven locations at 5-feet bgs and seven locations at 15-feet bgs to identify any areas or pockets of methane. Three locations of elevated concentrations of methane were detected and soil-gas probe sets were installed at 5, 15 and 25-feet bgs at these locations. The probe sets were sampled after 24 hours equilibration and again after a minimum of 48 hours equilibration time. The testing was performed by EST, licensed by the City of Los Angeles Department of Building and Safety (LADBS), in general accordance with the LADBS Site Testing Standards for Methane P/BC Document 2002-101. EST concluded that positive gas pressure was detected in approximately half of the probes indicating methane has the potential to penetrate and accumulate in above or below ground building structures; hydrogen sulfide was not detected in soil gas except for a low reading at one probe location at 5-feet bgs, therefore hydrogen sulfide is not a concern at the Project Site; methane concentrations exceeded the action level for methane in soil gas of 5,000 parts per million volume (ppmv) in two 25-foot probe at SV7 and SV12, requiring further investigation or mitigation for future redevelopment of the Project Site. Based on the low level of pressure (less than 2 inches of water column [IWC]) and methane concentrations greater than the action level of 5,000 ppmv, EST recommended a Level IV Site Design Level with a passive sub-slab vent system for methane mitigation per LADBS Ordinance No. 175790 dated March 29, 2004. The Proposed Project would include a sub-slab liner and passive venting system.

Subsurface Findings

Within the limitations of the soil-gas screening that was conducted as part of the Phase II ESA, VOCs, with the primarily COC being TCE, were detected in soil gas across the Project Site, particularly in the north/west quadrants of the property. TCE was detected in nearly every sample but the highest concentrations were in the west-to-northwest portion of the property ranging from 600 to 35,000 $\mu g/m^3$. Concentrations of TCE in soil gas appear to increase with depth with the highest concentration in the northwest portion of the property and declining in a southeasterly direction. The potential risk from VOCs will be addressed and mitigated through the design of the building which includes locating all occupied spaces at least one level above a mechanically ventilated parking structure and the methane mitigation system that includes a passive venting system including appropriate liner beneath the foundation of the building in accordance with applicable regulations under Division 71 of the LAMC.

VOCs were not detected in the soil samples collected from the soil gas borings and selected for analysis. Title 22 metal analysis identified eight of the 17 metals in the Title 22 list however all concentrations were below the USEPA Regional Screening Levels (RSLs) and the residential CHHSLs. A concentration of lead was detected at SV8-5 at 5 feet (70 mg/kg) which is less than the USEPA RSL and the residential CHHSL but over ten times higher than the STLC on factor used to determine if a waste is hazardous for landfill disposal and was further analyzed by California's Waste Extraction Test (WET) and federal Toxicity

Characterization Leaching Procedure (TCLP). The results of that analysis resulted in non-detectable soluble concentrations. Therefore, subsequent testing results of the sample were below the STLC.

Six groundwater monitoring wells were installed across the Project Site in proximity to the soil gas borings. Groundwater samples from these wells were analyzed for Title 22 metals and VOCs. All detected constituents were below the California and federal MCLs except for a slight exceedance of TCE concentrations at MW2 in the northwest corner of the Project Site. The concentration of TCE in groundwater at this location was only slightly (7.5 and 8.3 µg/l) above the MCL of 5 µg/l. Source(s) of the TCE could not be identified conclusively from the available data. The increasing concentrations of TCE with depth suggest that the source of TCE in soil gas is likely groundwater. This conclusion is further supported by laboratory results that did not detect VOCs in the soil samples tested and suggest that the source of TCE may be off-site.

The data do not identify a conclusive source or sources of the COCs in the soil gas or groundwater. However, the distribution of the COCs suggest that offsite sources may have contributed to the presence of these compounds.

Mitigation

Due to the above findings and recommendations presented in the Phase II ESA, a Soil Management Plan shall be incorporated during the construction and grading activities (refer to Mitigation Measures HAZ-1 below). During the excavation and grading phase, the transport and disposal of any hazardous materials and soil shall obtain approval from the Los Angeles Fire Department and Department of Building and Safety.

Additionally, due to the potential presence of methane gas in the subsurface, a passive venting system would be installed beneath the structure as part of a Level IV compliance with the Department of Building and Safety and Division 71 of the LAMC (Methane Seepage Regulations). This system would be compatible and effective to mitigate the volatile organic compounds identified in the Phase II ESA. Further, as a project design feature, the residential units within the proposed building would be located above at least one level of mechanically ventilated parking that would further mitigate the potential vapor risk. Therefore, with implementation of Mitigation Measure HAZ-1 and compliance with the building code regulations for methane, impacts relating to release of hazardous materials would be reduced to a less than significant level.

Mitigation Measure:

HAZ-1 Soil Management Plan

- A Soil Management Plan shall be developed to address site logistics and handling of soil impacted with the chemicals of concern or other environmental issues that may arise during excavation. During grading and excavation activities, suspect soil identified through field screening will likely require segregation and stockpiling for future testing and disposition along with sampling and testing to ascertain if the suspect material has been removed. The Soil Management Plan shall address field screening, laboratory sampling, establish action levels for removal and verification, identifying appropriate action levels, site logistics, and soil handling and disposition and

verification of remaining conditions on the property. Verification may include additional soil sampling, and a health risk assessment.

- The Applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.

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

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

There are no Los Angeles Unified School District (LAUSD) schools nor Culver City Unified School District schools that are approximately within one-quarter mile of the Project Site. The closest school to the Project Site is Cowan Avenue Elementary School, located approximately 0.7 mile southwest of the Project Site. Therefore, due to the distance between the Project Site and nearest school site, hazardous emissions or substances would be less than significant. Furthermore, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project Site, and use of these substances would comply with State Health Codes and Regulations. The proposed haul route traveling to the San Diego Freeway (I-405) from the Project Site would utilize Sepulveda Boulevard (southbound) and the Howard Hughes Parkway on-ramp. The haul route traveling from the I-405 to the Project Site would utilize the Jefferson Boulevard off-ramp and Sepulveda Boulevard (southbound). The inbound and outbound haul routes would not pass by the aforementioned school. Therefore, the Proposed Project would not create a significant hazard through hazardous emissions or the handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and a less than significant impact would occur.

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

storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

Environmental records were reviewed to determine if there are any on- or off-site sources of documented environmental concerns. The Project Site was not listed on any government agency list as a source of hazardous materials or contamination, as determined in the Phase I ESA. As discussed above, the Proposed Project would mitigate any potential hazardous impacts to less than significant with the implementation of Mitigation Measures HAZ-1 (Soil Management Plan) and compliance with the methane regulations under Division 71 of the LAMC. Based on the absence of any outstanding violations or reported releases from the Project Site, the Proposed Project would not exacerbate existing environmental conditions and would not be included on a list as a hazardous materials site. 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 project result in a safety hazard for people residing or working in the project area?

Less Than Significant Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest airport is the Los Angeles International Airport (LAX), approximately two miles south of the Project Site. The Proposed Project is located in an airport hazard area and has a 250-foot height limit above elevation 126 above mean sea level (MSL), which is an approximate 376-foot maximum elevation above MSL for any proposed building or development. The Proposed Project would reach a maximum elevation of approximately 130 feet above MSL at the top of the parapet. Based on the proposed building height, the Proposed Project would not expose its residents to any airport related hazard and would not exceed the height limitation. Furthermore, the Project Site is not located within an airport land use plan. Therefore, a less than significant impact would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. This question would apply to the Proposed Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not within the vicinity of a private airstrip. Therefore, no impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency

response or evacuation plan, and the severity of the consequences. The Project Site is located on an identified disaster route along Sepulveda Boulevard, south of the San Diego Freeway (I-405).[25,26] Furthermore, development of the Proposed Project may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part from the project's exacerbation of existing environmental conditions?

No Impact. The Project Site is located in a highly urbanized area of the City of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[27] Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the 21 related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles and Culver City. However, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

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

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

[27] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: www.zimas.lacity.org, accessed October 2017.*

IX. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the Low Impact Development (LID) Ordinance (No. 181,899) requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction

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

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

The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CASOO4001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

Approximately 84 percent of the Project Site is developed with impervious surfaces, which includes the existing self-storage building and surface parking lot. As discussed previously, the west side of the Project Site is undeveloped (see Figure II-3, Aerial View of the Project Site and Surrounding Land Uses). Therefore, the majority of surface water runoff from the Project Site is currently directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. As seen in Figure II-6, Plot Plan, the Proposed Project would include the development of a courtyard on the western portion of the Project Site, which is currently undeveloped. Although the percentage of the Project Site developed with impervious surfaces would increase, the amount of surface water runoff from the Project Site would likely decrease with the construction of the Proposed Project because the Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) Ordinance standards. Surface water runoff from the Project Site flows north along Sepulveda Boulevard and is directed to a storm drain immediately adjacent to the Project Site on the west side of Sepulveda Boulevard.[28] Stormwater would be directed towards existing stormwater infrastructure that currently serve the Project Site. The Proposed Project would not be expected to increase surface water runoff compared to existing conditions, because the Proposed Project would be required to comply with LID requirements, further discussed below.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the LID Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[29]

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[28] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed October 2017.*

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

The Proposed Project falls within the second tier of the LID requirements, which state that development projects that involve five or more units intended for residential use and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.[30] Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[31]

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

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[32]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge

[30] *City of Los Angeles Ordinance No. 183,833, 2015.*
[31] *Ibid.*
[32] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

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

As discussed in Question IX(a), the Project Site is approximately 84 percent impervious. As such, approximately 84 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and would not percolate into the groundwater table beneath the Project Site. With the proposed landscaped setbacks on the northern and southern property lines, the Proposed Project would redevelop the Project Site with approximately 90 percent impervious surfaces. According to the Geotechnical Report, groundwater was encountered at a depth between 35 to 40 feet below the existing grade. Excavations up to about 13 feet below the existing grade on the east end of the Project Site and about 26 feet below the existing grade/slope on the west end of the Project Site are planned. Therefore, the Geotechnical Report concluded that dewatering system would not be anticipated during construction. However, the historic high groundwater is between 5 to 10 feet below ground surface at the Project Site according to the Seismic Hazard Zone Report (CGS, 1998). Thus, a subdrain system would be incorporated in foundation design to prevent the build-up of hydrostatic pressure below floor slabs.[33] The Proposed Project would incorporate the recommendations in the Geotechnical Report regarding floor slabs and a subdrain system. As the Proposed Project would be served with potable water by the Los Angeles Department of Water and Power, it would not cause the depletion of groundwater supplies. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

[33] *Group Delta Consultants, Inc., Geotechnical Design Report, Proposed Multi-Family Development, Assessor Parcel Number: 4110001004, 6711 S. Sepulveda Boulevard, Los Angeles, California, dated September 6, 2017 (Appendix C to this IS/MND).*

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on or within the Project vicinity. As such, there is no potential for the Proposed Project to alter the course of a stream or river.

Stormwater on the Project Site is directed to existing storm drains. Implementation of the Proposed Project would fully develop the Project Site and would not increase site runoff or result in any changes in the local drainage patterns. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Proposed Project. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site. Development of the Proposed Project would result in a less than significant impact.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

Currently, the Project Site is approximately 84 percent covered with impervious surfaces and approximately 84 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located on Sepulveda Boulevard.[34] Following the development of the Proposed Project, runoff from the Project Site would be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention or treatment BMPs would be required as part of the LID requirements. Any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first ¾ –inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, which would reduce the Proposed Project's impact to the stormwater infrastructure. Additionally, any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. The Proposed Project would comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality would ensure impacts are less than significant. Therefore, the Proposed Project would not create or contribute to runoff water, which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Potential impacts to surface water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be typically associated with the operation of the Proposed Project and the use of these substances would comply with State Health Codes and Regulations. Further, the Proposed Project would comply with all federal, state and local regulations governing stormwater discharge. Therefore, a less than significant impact would occur.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if the Proposed Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA), the Project Site is not located in an area designated as a 100-year flood hazard area. The Project Site in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.[35] Therefore, the Proposed Project would not place housing within a 100-year flood hazard area, and no impact would occur.

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[34] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed October 2017.*

[35] *Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map (Map number 06037C1760F), September 26, 2008.*

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Proposed Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.[36] The Project Site is located in an urbanized area of the City of Los Angeles. As no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. A significant impact may occur if the Proposed Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche. A review of the City of Los Angeles General Plan Safety Element indicates that the Proposed Project does not lie within an inundation or tsunami hazard area.[37] Thus, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, no impact would occur with respect to the failure of a levee or dam.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. The Proposed Project is not located in an inundation and tsunami hazard area as identified in the City of Los Angeles' General Plan Safety Element.[38] There are no adjacent bodies of water near the Project Site. The Project Site is located approximately 3.5 miles from the coast. Therefore, the Project Site is not subject to slope instability, tsunamis, and seiches. Since the Project Site is located within a developed area within the City of Los Angeles, the potential for mudflow from tsunami and seiches to impact the Project Site is relatively low. Therefore, no impact would occur.

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[36] *Ibid.*

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

[38] *Ibid.*

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already urbanized area. As discussed above, 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 project sites, since the surrounding area is already developed. Each related project would be required to implement applicable stormwater measures. 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. The Proposed Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

X. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Proposed Project Site is located within an urbanized area of the Westchester – Playa del Rey community and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The Proposed Project includes an eight-story multi-family residential building on a site that is currently occupied by a vacant self-storage facility and its associated surface parking lot. The Project Site is zoned C4-1 (Commercial Zone) and the General Plan land use designation for the Project Site is General Commercial, which allows for multi-family residential development.

As discussed in Section II. Project Description, and shown in Figure II-3 and Figure II-5, the Project Site is surrounded by a mix of commercial, office, industrial, and single-family land uses. Properties to the north are zoned C4-1 and consist of commercial and restaurant uses. Properties located to the east of the Project Site (across Sepulveda Boulevard) are generally zoned C2-1 with General Plan land use designations of Regional Commercial. The property to the south consists of a commercial office building that is proposed for a multi-family residential development, similar to the Proposed Project. As such, no separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. The Proposed Project is consistent with the zoning designations and General Plan land use designation on the Project Site.

Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: the General Plan of the City of Los Angeles, the Westchester-Playa del Rey Community Plan; the Coastal Transportation Corridor Specific Plan; the Los Angeles Municipal Code (LAMC); Freeway Adjacent Advisory Notice area (ZI-2427); and a Transit Priority Area in the City of Los Angeles, all of which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

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

SCAG Regional Comprehensive Plan

The Project Site is located within the six-county region that comprises the SCAG planning area. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use

challenges and opportunities. The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would redevelop a site that is currently developed with a vacant self-storage facility and would include the construction of a multi-family residential development. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities within a High Quality Transit Area (HQTA). Furthermore, the Proposed Project would add up to 180 residential units, generating approximately 347 residents.[39] As discussed in Section XIII, Population and Housing, the Proposed Project's estimated population growth would be consistent with SCAG's future growth projections for the City of Los Angeles.

Local Plans

City of Los Angeles General Plan

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, which include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.[40]

Those elements that would be most applicable to the Proposed Project are the Housing Element, the Land Use Element, and the Mobility Plan. Housing Element objectives with which the Proposed Project would conform include: encouraging production and preservation of an adequate supply of rental and ownership housing to meet the identified needs of persons of all income levels and special needs; encouraging the location of housing, jobs, and services in mutual proximity; and accommodation of a diversity of uses that support the needs of the City's existing and future residents. The Proposed Project would conform to the General Plan Framework Housing Chapter and the Housing Element goals by enhancing the housing supply in the City. The Proposed Project provides the area with greater diversity in type and cost of housing that increases housing opportunities for a larger array of income levels. The Proposed Project's 180 dwelling units would also be accessible to all persons without discrimination. The Proposed Project would also reserve 11 percent of the base density as Very Low-Income units. The development would generate new residents that are within close proximity to bus lines and commercial areas that provide services and job opportunities. The Proposed Project would also conform to the City of Los Angeles General Plan Framework Element (Framework) designation for High Density Residential land uses. Additionally, the Proposed Project would enhance the surrounding community by developing an infill site, which currently contains a vacant self-storage facility, with a multi-family residential development.

[39] *See Checklist Question XIII(a) Population and Housing.*

[40] *City of Los Angeles Department of City Planning, General Plan Elements, website: https://planning.lacity.org/GP_elements.html, accessed October 2017.*

Los Angeles Municipal Code

The Project Site's total lot area consists of approximately 53,610 square feet (1.23 acres). The Project Site is currently improved with a vacant self-storage facility and its associated surface parking lot. The Proposed Project includes the construction of a residential development, which would include up to 180 multi-family residential units.

The Project Site is located within the City of Los Angeles, which is subject to the requirements in the Los Angeles Municipal Code (LAMC). The General Plan land use designation for the Project Site is General Commercial, and the zoning designation is C4-1, which allows for residential, commercial, and office land uses. The Proposed Project would be comprised of residential uses. Residential uses are permitted on lots zoned for C4, provided that the uses for residential purposes comply with all regulations of the R4 Multiple Residential Zone.

Floor Area

The Project Site is currently developed with a vacant self-storage facility and surface parking lot. The Project Site's total lot area is approximately 53,610 gross square feet. The Project Site is zoned C4-1 with a General Plan land use designation of "General Commercial." The "1" designation indicates that the Project Site is located in Height District No. 1, which, pursuant to LAMC Section 12.21.1.A, does not specify a maximum height and allows for a total floor area of 1.5 times the buildable area of the lot, allowing 80,415 square feet of floor area on the Project Site.

As noted, the Applicant is seeking an on-menu incentive under LAMC Section 12.22 A.25(f)(4) to increase the allowed FAR to a maximum of 3:1 FAR, which equals 160,830 square feet of allowed floor area. The Proposed Project includes a total of 160,830 square feet with a corresponding FAR of 3:1. Therefore, with approval of the request for an on-menu FAR incentive, development of the Proposed Project would be within the allowable FAR for the Project Site.

Building Height

As stated above, the Project Site is located in Height District No. 1, which does not specify a maximum height and limits development to a FAR of 1.5:1. However, the closest airport is the Los Angeles International Airport (LAX), approximately two miles south of the Project Site. The Proposed Project is located in an airport hazard area and has a 250-foot height limit above elevation 126 feet above mean sea level (MSL), which is an approximate 376-foot maximum elevation above MSL for any proposed building or development on the Project Site. The highest elevation of the Project Site is approximately 55 feet above MSL and slightly slopes to the northeast.[41] The Proposed Project's architectural features would reach a maximum height of 91 feet above grade and a maximum elevation of 130 feet above MSL at the top of the

[41] *Ecobility Corporation, Phase I Environmental Assessment Report, 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045, July 19, 2017*

parapet. Due to the relatively short building height, the Proposed Project would not expose its residents to any airport related hazard and would not exceed the height limitation.

Density

Pursuant to Section 12.16.A of the LAMC, the lot area requirements of the R4 Zone applies to all portions of buildings erected and used for residential purposes in the C4 Zone. Under the R4 Zone, the minimum lot area per dwelling unit shall be 400 square feet, which equals a base density of 134 dwelling units for the Proposed Project. The Applicant would set aside 11 percent of its base density (15 units) for Very Low-Income housing units, which entitles the Applicant to a 35 percent density bonus by right. Therefore, the Proposed Project's 180 residential dwelling units would be consistent with the allowed density on the Project Site.

Setbacks

Pursuant to LAMC Section 12.16.C, front yards are not required for a C4 zone. Side yards shall be applied for portions of buildings used for residential purposes, which requires that one foot shall be added to the width of the required 5-foot side yard for each additional story above the 2nd floor. Due to the orientation of the Project Site, rear yards are not applicable to the Project Site since it is considered a "through lot" with two front yards. Therefore, the Proposed Project would require no front setbacks and 11-foot side yard setbacks. The Proposed Project would provide an approximate 11-foot side yard setback on the northern property line and an 11-foot side yard setback on the southern property line. Therefore, the Proposed Project would be consistent with the required setbacks for a C4 zone with residential land uses.

Open Space

Pursuant to LAMC 12.21.G, the Project Site is required to provide 18,425 square feet of open space for the future residents. The Applicant is requesting a 20 percent reduction in required open space as a Density Bonus on-menu incentive, which would reduce the open space requirement to 15,540 square feet of open space. The Proposed Project would provide 15,540 square feet of open space on-site. As shown in Table II-3 in Section II, Project Description, the Proposed Project would be in compliance with the minimum open space requirements of the LAMC with approval of the density bonus incentives. Common open space would include but not limited to, a dog walking area, an outdoor courtyard and lounging area, barbecue grill, fire pit, a pool deck, community room, a sky deck, and balconies. As part of the open space requirements, the residential component of the Proposed Project includes planting trees at a rate of one tree for every four dwelling units, which is a minimum of 45 required trees. The Project Site would include 45 trees on site, which is consistent with LAMC requirements. As such, with approval of the on-menu density bonus incentive, the Proposed Project would be consistent with the open space requirements for the Project Site.

Parking

As previously discussed, the Proposed Project meets all of the criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an

infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099. The following impact discussion is provided for informational purposes only.

Parking for the proposed residential building on-site would be provided in one level of subterranean parking and two levels of above grade parking. As summarized in Table II-4, in Section II, Project Description, the Proposed Project would be consistent with the applicable parking requirements, based on California State Assembly Bill (AB) 744. AB 744 prohibits the City from requiring in excess of 0.5 parking spaces per bedroom for a development that includes the maximum percentage of low- or very low-income units required to obtain a 35 percent density bonus is located within ½ mile of a major transit stop and there is unobstructed access to the transit stop from the development. The Proposed Project would provide 11 percent of its base density as Very Low-Income units and is located within a ½ mile of the intersection of Sepulveda Boulevard and Centinela Avenue, which identifies as a major transit stop. As such, the Proposed Project would be required to provide a minimum of 119 automobile parking spaces and proposes to provide 210 automobile parking spaces. Therefore, the Proposed Project would be consistent with the vehicle parking requirements of AB 744.

Pursuant to LAMC Bicycle Ordinance (Section 12.21.A.16), the Proposed Project is required to supply 18 short-term bicycle parking spaces and 180 long-term bicycle parking spaces, for a total of 198 bicycle parking spaces. The Project proposes to provide 198 bicycle parking spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking numbers.

As discussed in the previous paragraphs, the Proposed Project would not conflict with the goals, objectives, and allowable land uses in the Los Angeles Municipal Code (LAMC). Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC, and impacts would be less than significant.

Westchester-Playa del Rey Community Plan

The Project Site is located within the Westchester-Playa del Rey Community Plan area (CPA). Therefore, all development activity on-site is subject to the land use regulations of the Westchester-Playa del Rey Community Plan (Community Plan). The Project Site has a land use designation of General Commercial and is zoned C4-1. The General Plan land use designation of General Commercial corresponds to the C1.5, C2, C4, CR, RAS3, and RAS4 zones. The Project proposes to develop an eight-story multi-family residential building with a total of 180 dwelling units. Table III-8, below, discusses the Proposed Project's consistency with applicable goals, objectives, and policies of the Westchester – Playa del Rey Community Plan.

Table III-8
Project Consistency with the Westchester – Playa del Rey
Community Plan for Residential Land Uses

Applicable Objective / Policy	Project Consistency
Goal 1: Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Westchester – Playa del Rey Community.	The Los Angeles Police Department (LAPD) would be consulted during the design and construction of the Proposed Project to ensure on-site security and reduce dead zones and attractive nuisances. The Proposed Project would implement principles of the City of Los Angeles Crime Prevention through Environmental Design (CPTED) Guidelines to enhance on-site security. The Proposed Project would be attractively designed and landscaped to encourage pedestrian activity on-site and in the vicinity. The proposed dwelling units would be available to all persons without discrimination. As such, the Proposed Project would be consistent with this Goal.
Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Westchester-Playa del Rey Community Plan Area to the year 2025.	The Proposed Project would provide multi-family dwelling units to meet the needs of the Community Plan Area and City's projected population. The Proposed Project would provide a diverse number of housing options for the community, such as restricted affordable housing for very low-income families and dwelling units at market rate for all persons, without discrimination. Thus, the Proposed Project would be consistent with this Objective.
Policy 1-1.1: Protect existing stable single family and low density residential neighborhoods, such as Kentwood, from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.	The Proposed Project would introduce a residential development that would provide multi-family dwelling units. The Project Site is zoned C4-1 with a General Plan land use designation of General Commercial. Low-density neighborhoods are located south of the Project Site atop an abutting hillside/bluff. The Proposed Project would not encroach on any single-family neighborhoods. The design of the Proposed Project would ensure that the Project is visually consistent with the scale and massing of the surrounding community. The Proposed Project would not diminish the quality of life in the neighborhood. Thus, the Proposed Project would be consistent with this Policy.
Policy 1-1.2: The City should promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple family residences.	Although this Policy is directed towards the City and does not specifically apply to the Proposed Project, the development of the Proposed Project would not hinder this policy. The Proposed Project aims to increase the residential housing stock by developing multi-family dwelling units and would not disturb or demolish any existing single and multi-family homes. Thus, the Proposed Project would be consistent with this Policy.
Policy 1-1.3: Provide for adequate Multiple Family residential development.	The Proposed Project would include the development of safe, attractive, and centrally located multi-family residential units, including affordable units. The Proposed Project would increase the multiple-family residential housing choices available in the Westchester – Playa del Rey Community Plan area. Thus, the Proposed Project would be consistent with this Policy.
Policy 1-1.4: Provide for housing along mixed-use boulevards where appropriate.	The Proposed Project would include development of multi-family residential units, including affordable units,

	along Sepulveda Boulevard. The Proposed Project is consistent with the surrounding neighborhood by adding a high-density residential building to an area that is characterized by a variety of land uses including office, commercial, retail, and residential developments along Sepulveda Boulevard. The Project Site is also located within a Transit Priority Area that encourages mixed-use, infill development near major transit centers. The Proposed Project includes the development of a residential building near a variety of land uses and promotes non-motorized and public transportation. Therefore, the Proposed Project would be consistent with this Policy.
Objective 1-2: Locate housing near commercial centers, public facilities, and bus routes and other transit services, to reduce vehicular trips and congestion and increase access to services and facilities.	The Proposed Project would include multi-family dwelling units, including affordable units, along Sepulveda Boulevard. The Project Site is located near the Promenade of Howard Hughes Center, commercial offices, and other potential employment centers. These employment opportunities would be provided to the future residents, which would enable residents to live and work in the neighborhood. Additionally, the Project Site is also located in a Transit Priority Area in the City of Los Angeles, which is served by several Metro, LADOT, and Culver City bus lines. The Proposed Project is also located along the commercial corridors of Sepulveda Boulevard, which would provide residents with access to facilities and services in walking distance from the Project Site. Thus, the Proposed Project supports this Objective.
Policy 1-2.1: Locate higher residential densities near commercial centers, public facilities, bus routes and other transit services.	The Project Site is located in an urbanized area of the Westchester – Playa del Rey community and is in walking distance to numerous services, retail, and employment opportunities along Sepulveda Boulevard. The Howard Hughes Center is located just east of the Project Site that provides numerous retail, restaurant, and entertainment opportunities for the future residents. Additionally, the Project Site is located in a designated Transit Priority Area and in close proximity to public transportation options, including Metro, LADOT, and Culver City bus stops and services. Thus, the Proposed Project supports this Policy by locating higher residential densities near commercial centers, public services, and bus routes. The Proposed Project would be consistent with this Policy.
Objective 1-3: Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	The Project Site is currently occupied by a vacant self-storage facility and surface parking lot, and as such, the Proposed Project would not demolish any existing residential units. The Proposed Project would increase the housing stock in the Westchester – Playa del Rey community with safe, attractive, and centrally located studios, one-bedroom, and two-bedroom units. The diverse availability of housing would enhance the residential character and integrity of the surrounding neighborhoods by replacing a currently underutilized site with a new residential building that would transition the single-family neighborhood to the south/southwest with the surrounding commercial uses. Thus, the Proposed

	Project would be consistent with this Objective.
Policy 1-3.1: Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.	The Proposed Project would replace a site that is currently occupied by a vacant self-storage facility and surface parking lot with a multi-family residential development. The Proposed Project would contain landscaped areas on the ground floor and proposed courtyards. The Proposed Project would be attractively designed and landscaped with guidance of City Planning Staff and other necessary City departments. Additionally, the Proposed Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site to protect the architectural compatibility, character, and scale of existing neighborhood, such as the LAMC. Thus, the Proposed Project would be consistent with this Policy.
Policy 1-3.2: Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.	Vehicular access to the Project Site would be provided via one right-in/right-out driveway along Sepulveda Boulevard, which would provide access to the residential parking spaces. Sepulveda Boulevard is classified as a Boulevard I roadway in the Mobility Plan and a Primary Artery in the City of Culver City. Thus, it is not considered a residential street. The Proposed Project's trip generation would not spillover to the low density neighborhoods to the south of the Project Site fronting Arizona Avenue, because there would be no direct street access to those neighborhoods. Therefore, the Proposed Project would not encourage spillover traffic on local residential streets and would be consistent with this Policy. Although this policy is directed towards to the City, the Proposed Project would not hinder the intent of this Policy.
Policy 1-3.3: Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.	The Proposed Project would provide safe, attractive, and centrally located multi-family dwelling units in a C4-1 zone. The zoning allows for residential uses and would be compatible with the surrounding land uses along Sepulveda Boulevard. Additionally, the Proposed Project would be developed with guidance of City Planning Staff and other necessary City departments. The Proposed Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site to adhere to the community plan land use designations, such as the LAMC. As discussed in Section XIV, Public Services, the Proposed Project would have a less than significant impact on public services, such as fire protection, police protection, schools, parks, and libraries. Additionally, the Proposed Project would result in less than significant impacts related to transportation and traffic with implementation of appropriate mitigation measures, as further discussed in Section XVI, Transportation and Traffic. Therefore, the Proposed Project would be consistent with this Policy.
Objective 1-4: Provide affordable housing and increased accessibility to more population segments, especially students, the disabled and senior citizens.	The Proposed Project would set aside 11 percent of its base density as "Very Low-Income" housing units and the remaining dwelling units would be available to all persons at market value without discrimination. Thus, the Proposed Project would provide affordable housing and would be consistent with this Objective.

Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	The Proposed Project would increase the diversity of the housing stock within the Community Plan area, by providing a variety of dwelling units such as studios, one-bedroom, and two-bedroom units including 15 affordable housing units. Thus, the Proposed Project would increase individual choice in type, quality, price, and location of housing with the Community Plan area. Thus, the Proposed Project would be consistent with this Policy.
Policy 1-4.2: Promote the development of housing for persons of low to moderate income within the community.	The Proposed Project would be adding a mix of studio units, one-bedroom units, and two-bedroom units to the Westchester – Playa del Rey Community Plan area. The Proposed Project would set aside 11 percent of its base density as "Very Low-Income" housing units. Thus, the Proposed Project would promote housing for persons with lower income within the community. As such, the Proposed Project would be consistent with this Policy.
Policy 1-4.3: Ensure that new housing opportunities minimize displacement of residents.	The Project Site is currently developed with a vacant self-storage facility and surface parking lot. The Proposed Project would demolish the existing structure and aims to increase the residential housing stock by developing multi-family dwelling units. The Proposed Project would not disturb or demolish any existing single and multi-family neighborhoods. The Proposed Project would not displace any existing residents and would support this Policy.
Policy 1-4.4: Encourage multiple family residential and mixed use development in commercial zones, pedestrian oriented areas, and near transit corridors.	The Project Site has a zoning designation of C4-1 and is zoned for commercial development. The Project Site is also located within a Transit Priority Area that encourages mixed-use, infill development near major transit centers. The Project includes the development of a multi-family residential building near the commercial corridors along Sepulveda Boulevard. The Project Site is located near a variety of land uses including office, commercial, and retail. The Promenade at Howard Hughes Center is located on Sepulveda Boulevard across from the Project Site. Additionally, the Project Site is in close proximity to public transportation options, including Metro, LADOT, and Culver City bus stops and services and would promote the use of non-motorized and public transportation. As such, the Proposed Project is consistent with this Policy.
Objective 1-5: Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.	The Proposed Project would introduce a residential development that would provide multi-family dwelling units to the Community Plan area. The Project Site is zoned C4-1 with a General Plan land use designation of General Commercial. Low-density residential neighborhoods are located approximately 215 feet south and southwest of the Project Site, atop a hillside/bluff. The Proposed Project would not encroach on any single-family neighborhoods and would be buffered from these neighborhoods due to the higher elevation of these residential neighborhoods and substantial, landscaped setbacks. The design of the Proposed Project would ensure that the Project is visually consistent with the scale and massing of the surrounding community. The Proposed Project would not diminish the quality of life in

	the existing residential neighborhoods. Thus, the Proposed Project would be consistent with this Objective.
Policy 1-5.1: Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.	The Proposed Project would introduce a residential development that would provide multi-family dwelling units. As stated above, low-density residential neighborhoods are located approximately 215 feet south and southwest of the Project Site atop a hillside/bluff. The bluff would remain undeveloped and would create a buffer between the Proposed Project and the single-family neighborhoods. Additionally, the commercial office property to the south is proposed for multi-family development and is located between the Project Site and the bluff. The Proposed Project would not encroach on any single-family neighborhoods. Thus, the Proposed Project would support this Policy.
Objective 1-6: Preserve visual resources in residential areas.	The Project Site is currently developed with a vacant self-storage facility and surface parking lot. The Proposed Project would demolish the existing structures and would construct a residential development with multi-family dwelling units and would not disturb or demolish any existing single- and multi-family neighborhoods. Additionally, the Proposed Project would not demolish or alter any existing visual resources in the area. The design of the Proposed Project would ensure that the Project is visually consistent with the scale and massing of the surrounding community. The Proposed Project would not disturb any residential resources. Thus, the Proposed Project would be consistent with this Objective.
Policy 1-6.1: The preservation of existing scenic views from surrounding residential uses, public streets and facilities, or designated scenic view sites should be a significant consideration in the approval of zone changes, conditional use permits, variances, divisions of land and other discretionary permits.	The Proposed Project would reach a maximum height of approximately 91 feet above grade along the eastern property line. As stated in Section I, Aesthetics, the Project Site is not located along a scenic highway. Views in the vicinity of the Project Site are largely constrained by adjacent structures and the abutting elevated hill. No locally designated or protected scenic views are provided from or through the Project Site. The Applicant does not request any zone changes, conditional use permits, or zone variances. Thus, the Proposed Project would support this Policy.
Policy 1-6.2: Protect the public views and scenic quality of the highly unique residential areas in this community, such as those located along the coast and on the Westchester Bluffs.	As stated above, views in the vicinity of the Project Site are largely constrained by adjacent structures and the abutting elevated hill/bluff. No locally designated or protected scenic views are provided from or through the Project Site. Low-density residential neighborhoods are located approximately 215 feet south and southwest of the Project Site atop the abutting hillside. The Proposed Project's roof level would reach a maximum elevation of 130 feet above MSL, which would be the same approximate elevation as the ground level of the single-family homes on the hillside. The Proposed Project would not block or detract any views of the residential neighborhoods. Thus, the Proposed Project would be consistent with this Policy.
Source: City of Los Angeles, Westchester – Playa del Rey Community Plan, April 13, 2004. *Parker Environmental Consultants, 2017.*	

The Westchester – Playa del Rey Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. The Westchester - Playa del Rey Community Plan projected a population of 103,520 persons and 46,950 dwelling units by 2010 within the Community Plan area.[42] The 2010 United States Census shows that the Westchester - Playa del Rey Community Plan area had an actual population of 55,073 persons and 25,267 dwelling units in 2010.[43] Additionally, the City's 2015 Growth and Infrastructure Report estimated a population of 59,446 persons and 27,753 housing units in the Community Plan area in 2015. Thus, the 2010 Census data and the Growth and Infrastructure report shows that the population and housing units in the Westchester - Playa del Rey Community Plan area in 2010 and 2015 are well below than what was projected in the Community Plan. As such, the Proposed Project would be consistent with the population and housing projections and capacities in the Community Plan. Furthermore, as discussed in Section XIII, Population and Housing, the Proposed Project is consistent with SCAG's population and housing growth projections for the City.

The Proposed Project would be consistent with the goals, objectives, and policies set forth in the Westchester - Playa del Rey Community Plan. Therefore, impacts related to the consistency with the applicable land use and planning policies in the Westchester - Playa del Rey Community Plan would be less than significant.

Los Angeles Coastal Transportation Corridor Specific Plan

The Project Site is also located in the Los Angeles Coastal Transportation Specific Plan. The Coastal Transportation Corridor Specific Plan intends to:

- Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new commercial and industrial development within the corridor;
- Establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M and P Zones and for development on property owned by the Department of Airports;
- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
- Establish a Coastal Transportation Corridor infrastructure implementation process;
- Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from severe overload;
- Avoid Peak Hour Level of Service (LOS) on streets and interchanges from reaching LOS F or, if presently at LOS F, preclude further deterioration in the LOS;
- Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
- Reduce commuter trips by encouraging the development of affordable housing at or near job site;
- Ensure that the public transportation facilities that will be constructed with funds generated by the

[42] *City of Los Angeles Department of City Planning, Westchester - Playa del Rey Community Plan, pg. II-4.*
[43] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 1, 2016.*

Specific Plan will significantly benefit the contributor; and

- Encourage Caltrans to widen the San Diego Freeway for high occupancy vehicle lanes.[44]

The Proposed Project is required to have approval from LADOT and the City Engineer in order to be issued a building permit. Consistent with the Specific Plan, LADOT required the preparation of a traffic study. In the Proposed Project's LADOT approval letter (see Appendix G to this IS/MND), LADOT concluded that the Proposed Project would mitigate any significantly impacts on the intersections studied to less than significant levels. For further discussion on transportation impacts, refer to Section XVI, Transportation and Traffic of this IS/MND. As discussed in Section XVI, the Proposed Project would comply with all designs recommended by LADOT to ensure that any transportation impacts are less than significant.

It is important to note that the Los Angeles Coastal Transportation Corridor Specific Plan is currently undergoing an update. A draft version of the Specific Plan Update and Draft EIR were released in January 2016, which could be adopted at some point in 2018. The update would not exempt multi-family construction projects from payment of the transportation impact fees. The Proposed Project would comply with the applicable version of the Specific Plan in effect at the time of building permit issuance and would pay any applicable transportation impact fees. Therefore, impacts related to the consistency in the Coastal Transportation Corridor Specific Plan would be less than significant.

Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located on Sepulveda Boulevard, approximately 450 feet southwest of the San Diego Freeway (I-405). The City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways. ZI-2427 is an advisory notice informing planners and the public of the potential health risks associated with sensitive land uses that are within 1,000 feet of a freeway. Areas within 1,000 feet of freeways are known to experience the greatest concentrations of fine and ultrafine particular matter (PM) with greatest concentrations experienced within 500 feet of a freeway. Thus, the future occupants of the Proposed Project may be exposed to relatively poorer air quality emissions from vehicles traveling on the adjacent roadways and nearby freeway. While recent court rulings[45] have found that CEQA does not require an analysis of the impacts of the environment on a project, the AQMD and the City Planning Commission continue to recommend that, prior to the approval of a project, the impacts of air pollutants on people who would live in a new project are addressed and appropriately mitigated to the extent feasible. Providing enhanced filtration in building Heating, Ventilation, and Air Conditioning (HVAC) systems is an effective mitigation measure as it pertains to improving indoor air quality. As stated in Section 99.04.504.6 of the LAMC, mechanically ventilated buildings within 1,000 feet of the freeway are required to provide regularly occupied areas of the building with air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value of 13. The Proposed Project's residential dwelling units are subject to the

[44] *City of Los Angeles, Department of City Planning, Coastal Transportation Corridor Specific Plan, September 22, 1993, http://planning.lacity.org/complan/specplan/pdf/CTrans.pdf, accessed October 2017.*

[45] *California Building Industry Association v. Bay Area Air Quality Management District (S213478, December 17, 2015).*

MERV standards in the LAMC Section 99.04.504.6. Moreover, the Project design would locate a majority of the outdoor open space areas at the western end of the Project Site, screened from the freeway to the east by the proposed building. As such, with adherence to the LAMC and incorporation of such design considerations, the Proposed Project would ensure consistency with Freeway Adjacent Advisory Notice (ZI-2427).

Project Design Feature:

PDF-LU-1 The Proposed Project would locate a majority of the outdoor open space areas at the western end of the Project Site, screened from the freeway to the east by the proposed building to reduce exposure to the emissions from the vehicles traveling along Sepulveda Boulevard and the San Diego Freeway.

Regional and Local Plan Consistency

As discussed in the preceding paragraphs, the Proposed Project would be in substantial compliance with local and regional plans applicable to the Project Site. The Applicant would provide 11 percent of the base density as Very Low-Income units, which would entitle the Applicant to two on-menu incentives. Additionally, the Applicant would request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities, which may include, but are not limited to: demolition, excavation, shoring, grading, foundation, haul route, building construction. Upon granting these requests, any land use impacts would be considered less than significant level.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Section IV(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area, which is already developed with commercial uses and is also within an urbanized area of the City of Los Angeles. Therefore, the Proposed Project would not have the potential to conflict with an applicable habitat conservation plan or natural community conservation plan, and no impact would occur.

Cumulative Impacts

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

XI. MINERAL RESOURCES

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

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

The Project Site is zoned C4-1 with a General Plan land use designation of General Commercial. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[46] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources.[47] Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area.[48] As discussed above, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Cumulative Impacts

No Impact. Section 15355 of the State CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other

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

[47] *Ecobility Corporation, Phase I Environmental Assessment Report, Hanover Sepulveda, 6711 S. Sepulveda Boulevard, Los Angeles, CA 90045, July 19, 2017. (Appendix E.1 to this IS/MND)*

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

environmental impacts." As discussed above, the Proposed Project would have no impact on mineral resources. It is not known if any related project would result in the loss of availability of a known mineral resource. Nevertheless, because the Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Proposed Project would have no cumulative impact on such resources.

XII. NOISE

Fundamentals of Noise

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

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

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

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

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are

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

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

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[49]

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between

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

the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[50]

Ambient Noise Levels

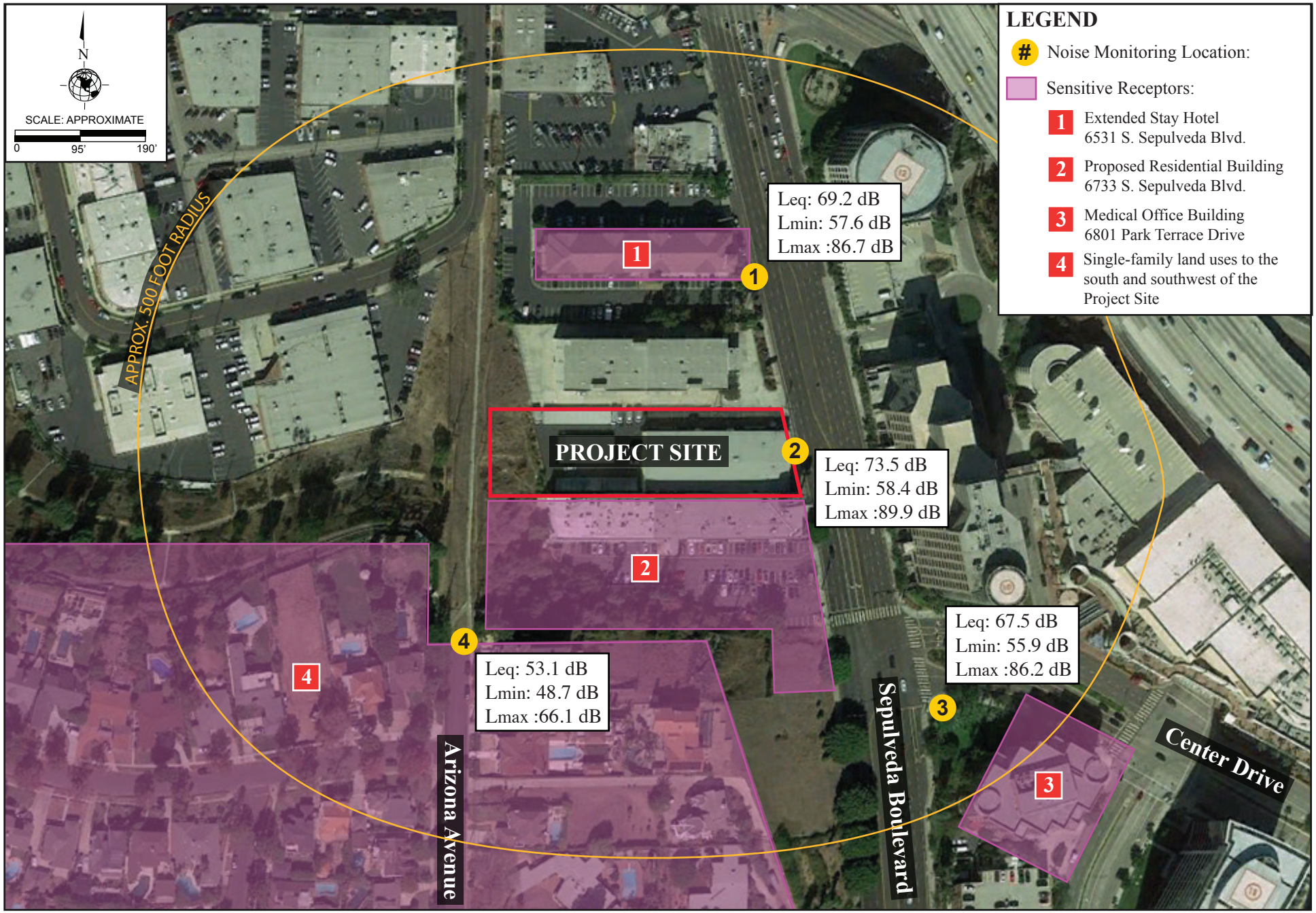
To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure III-2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential, hotel, and medical uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix F, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table III-9, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table III-9, the ambient noise in the vicinity of the Project Site ranges from 53.1 to 73.5 L_{eq}. The maximum instantaneous noise level during the four 15-minute recordings was 89.9 dB L_{max} along the west side of Sepulveda Boulevard, where an emergency vehicle passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels was vehicle traffic during the daytime hours, including cars, motorcycles, buses, and delivery trucks.

Table III-9
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics[a]		
			L_{eq}	L_{min}	L_{max}
1	Adjacent to Extended Stay Hotel at 6531 S. Sepulveda Boulevard	Vehicle traffic, delivery trucks, honking, buses, 405 Freeway	69.2	57.6	86.7
2	On the west side of Sepulveda Boulevard, adjacent to the Project Site	Vehicle traffic, delivery trucks, honking, buses, ambulance	73.5	58.4	89.9
3	Adjacent to Kerlan – Jobe Orthopaedic Clinic at 6801 Park Terrace Drive	Vehicle traffic, delivery trucks, honking, buses	67.5	55.9	86.2
4	At the north terminus of Arizona Avenue, adjacent to low-density residential neighborhood	Distant vehicle traffic from Sepulveda Boulevard, light vehicle traffic, dogs barking, airplane	53.1	48.7	66.1

Notes:
[a] *Noise measurements were taken on Tuesday, August 15, 2017 at each location for a duration of 15 minutes. See Appendix F of this IS/MND for noise monitoring data sheets.*
Parker Environmental Consultants, 2017.

[50] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*



Source: Parker Environmental Consultants, August 2017.

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Figure III-2
Noise Monitoring and Sensitive Receptor Location Map

Sensitive Receptors

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

1) 6531 S. Sepulveda Boulevard, Extended Stay America Hotel;
2) 6733 S. Sepulveda Boulevard, a proposed multi-family residential building;
3) 6801 Park Terrace Drive, Kerlan-Jobe Orthopaedic Clinic (medical office building which includes some overnight surgical patients.); and
4) Single-family residences located to south and southwest of the Project Site.

The locations of these land uses relative to the Project Site are depicted in Figure III-2, Noise Monitoring and Sensitive Receptor Location Map. For purposes of assessing construction-generated vibration impacts on building damage, the existing building abutting the Project Site immediately to the south, located at 6733 Sepulveda Boulevard, is within a close enough proximity to the Project Site to be susceptible to building damage from groundborne vibration during construction.

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Noise

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading and site preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of

construction equipment and activities that would occur at the Project Site are presented in Table III-10, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table III-10
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The noise levels shown in Table III-10 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could be expected to be 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.[51] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table III-10 during the approximate 24-month construction period.

Table III-11, below, shows the estimated exterior construction noise levels at the four identified sensitive receptor locations. The Proposed Project's construction noise levels at Sensitive Receptor No. 1, 3, and 4 would be under existing ambient noise levels, and thus would not be significantly impacted by the Proposed Project. Construction noise levels at Sensitive Receptor No. 2, however, would potentially be exposed to noise levels that exceeds the 75-dBA at a distance of 50 feet and thus could be significantly impacted.

[51] *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

Table III-11
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

ID [a]	Address / Sensitive Land Use [b]	Distance to Project Site (feet)	Existing Exterior Ambient Noise (dBA L_{eq})	Construction Noise Levels Without Mitigation (dBA L_{eq})	Construction Noise Levels With Mitigation (dBA L_{eq})	Noise Level Increase with Mitigation (dBA L_{eq})
1	6531 S. Sepulveda Boulevard, Extended Stay America Hotel	200	69.2	69.0	64.0	0.0
2	6733 S. Sepulveda Boulevard, Proposed residential building	<50	73.5	86.0	81.0	7.5
3	6801 Park Terrace Drive, Kerlan-Jobe Orthopaedic Clinic	450	67.5	61.9	56.9	0.0
4	Single-family residences to the south and southwest of the Project Site	215	53.1	68.3	63.3	10.2

Notes
[a] *See Figure III-2, Noise Monitoring and Sensitive Receptor Location Map.*
[b] *Sensitive Receptor No. 1, 3, and 4 incorporates a 5-dBA attenuation factor due to buildings in between the Project Site and identified sensitive receptors.*
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.
Parker Environmental Consultants, 2017.

Sensitive Receptor No. 2 currently consists of a commercial office building and its associated surface parking lot. This property, which is proposed to be developed with residential land uses in the future, would only be impacted if it is occupied by residential land uses prior to construction of the Proposed Project. This property is anticipated to be operation by 2019, which is one year prior to the Proposed Project's operational year. Therefore, it is likely that this property would be fully operational at the time of the construction phase of the Proposed Project.

It is recommended that a temporary noise barrier be installed along the southern and western property lines to further block the line-of-sight between the noise sources and the sensitive receptors. The construction of a temporary ¾ inch plywood noise barrier would be capable of attenuating the noise level by approximately 5 dBA. As mentioned above, construction noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. In addition, the building materials used in each of the sensitive receptors would further attenuate construction noise. For example, glass windows are capable of reducing noise by about 25 dBA.

Consistent with the Noise Ordinance, all feasible noise reducing mitigation measures would be incorporated to reduce the Proposed Project's noise impacts during construction. As noted in Mitigation Measure N-1 through N-4, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers, and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. The Proposed Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Proposed Project. Pursuant to LAMC Section

41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and federal holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Further, as required by LAMC Section 91.106.4.8 (Construction Site Notice), the Applicant would be required to post informational signage providing contact information 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 City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. With adherence to these regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise violations.

In accordance with LAMC Section 112.05, construction noise levels are exempt from the 75-dBA noise threshold if all technically feasible noise attenuation measures are implemented. As shown in Table III-11, the construction noise level is anticipated to reach the 75 dBA noise level for Sensitive Receptor No. 2, the proposed residential building to the south. Implementation of Mitigation Measures N-1 through N-4 would reduce the noise levels associated with construction of the Proposed Project to nearby sensitive receptors to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC Section 112.05, implementation of Mitigation Measures N-1 through N-6 would additionally ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible, and temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Mitigation Measures:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

N-1 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

N-2 Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

N-3 The project contractor shall use power construction equipment with noise shielding and muffling devices.

N-4 The project contractor shall erect a temporary noise-attenuating sound barrier along the southern and western property lines of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 5-dBA reduction in sound level.

Haul Truck Noise

During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 20,000 cubic yards (cy) of soil material and 2,489 tons of construction and demolition debris would be exported to a landfill located within the City. It is anticipated that 14 cy capacity haul trucks would be used to export the soil and construction/demolition debris. It is assumed that haul truck trips would occur uniformly predominately outside of peak hours. A Haul Truck Route program would be described for the Proposed Project and approved by LADOT as part of the Construction Management Plan. Since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved traffic control plan and during the hours as required by the Noise Ordinance and Mitigation Measure N-1, the haul truck noise would be considered less than significant.

Operational Noise

As defined in the *L.A. CEQA Thresholds Guide* for operational noise impacts, a project would normally have a significant impact on noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-12, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site stationary noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Noise from the Outdoor Courtyards

A pool deck would be located on the western portion of the Project Site on the 4th floor. A lower courtyard would be located on the 3rd floor along the southern property line. A sky deck would be located on the 8th floor on the northeast corner of the Project Site. The intended use of the pool deck and outdoor courtyards would be to have the residents and guests to lounge outside and utilize the pool amenities. LAMC Section 116.01 states that it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended use of the outdoor space (i.e. only up to a few people having a conversation, relaxing or enjoying the outdoors) would result in "loud, unnecessary and unusual noise"

Table III-12
Community Noise Exposure (CNEL)

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

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

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

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

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

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

criteria. It is not anticipated that there would be any amplified music or speakers on the pool deck, lower courtyard, or sky deck.

Based on the size of the courtyards and the type of amenities provided, it is anticipated that these areas could accommodate up to 114 people for casual outdoor gatherings: 28 people in the 3rd floor courtyard; 70 people in the 4th floor pool deck; and 16 people on the 8th floor sky deck. For purposes of estimating noise from people congregating in the outdoor courtyards, reference noise levels of 65 dBA and 62 dBA (L_{eq} at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, were used to analyze noise from the use of the outdoor courtyard areas. Assuming 114 individuals occupy these spaces at one time and up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time, the noise levels from activities on the outdoor courtyards would be approximately 75.22 dBA Leq on the 3rd floor courtyard, 79.19 dBA Leq within the 4th floor pool deck, and 72.78 dBA

Leq in the 8th floor sky deck.[52] All three courtyards would be enclosed by glass railings on all sides, and the pool deck would be buffered from noise sensitive uses by the adjacent hillside. Assuming approximate 3-dBA attenuation rates from the glass railings and 5 dBA for hillside and building attenuations, the noise levels for the surroundings sensitive receptors would reach a maximum of 69.65 dBA at the proposed residential building to the south, due to the relatively close distance (see Table III-13, below). This is below the measured ambient noise level for this receptor, as shown in Table III-11. As noise levels from the courtyard activities would not exceed the 5-dBA threshold at the sensitive receptors, outdoor activity noise levels would be less than significant. Therefore, compliance with regulatory compliance measures and the Proposed Project's design features detailed below, would ensure that noise impacts associated with operational activities from the outdoor courtyards would be less than significant.

Project Design Feature:

PDF-N-1: The outdoor amenity areas located on the 3rd floor courtyard, 4th floor pool deck, and 8th floor sky deck shall be surrounded with glass railings.

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing building on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels.

Based on estimated A-weighted noise ratings published for standard HVAC equipment,[53] noise levels from rooftop mounted HVAC equipment would be expected to range from 69 dBA Leq to 74 dBA Leq at the source. Based on the approximate distances to the nearby sensitive receptors, and an approximate -3 dBA attenuation factor for Code-required mechanical screening, the estimated noise levels at nearby sensitive receptors would range from 46.92 dBA Leq to 71 dBA Leq (see Table III-13, below), which would be below the 5-dBA threshold for a significant impact to occur. Therefore, the rooftop HVAC noise levels from the Proposed Project would not exceed the ambient noise levels by more than 5 dBA and would therefore meet the noise ordinance. As such, noise from mechanical equipment would be less than significant.

[52] *Cyril M. Harris, Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991.*

[53] *Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons).*

Parking Structure Noise

Operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels.

The primary entrance to the parking garage would be from Sepulveda Boulevard at the southeast end of the Project Site. As discussed in Section II, Project Description, the Proposed Project would provide 210 on-site parking spaces in a one level of subterranean parking and two levels of above-grade parking. Parking structures generate noise from vehicles engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the garage structure would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. Noise levels are anticipated to be highest during the A.M. and P.M. peak hours, corresponding to the volumes of project-generated traffic as reported in Section XVI, Transportation and Traffic. As noted in Section XVI, Transportation and Traffic, the Proposed Project's highest peak hourly traffic volumes would be 92 vehicles, generated during the P.M. peak hour. Using the recommended methodology for calculating parking structure noise as published by the Federal Transit Administration, the predicted noise levels from the parking garage for the highest peak hour were calculated. Estimated noise levels from within the parking structure would be expected to range from 40 dBA Leq to 46.04 dBA Leq at a distance of 50 feet (See Appendix F of this IS/MND). The combined noise level from parking garage activities were then calculated and added to the ambient noise levels at the four identified sensitive receptors, as shown in Table III-13, below. The estimated noise levels from the parking garage would be below the ambient noise levels at all four sensitive receptor locations. It should be noted that the calculations provided below are conservative, as they do not account for any attenuation resulting from intervening structures. As such, noise from the parking structure would not increase ambient noise levels by 5 dB, and impacts would be less than significant.

Composite Noise Levels

On-site noise sources associated with the Proposed Project would include mechanical HVAC equipment, outdoor courtyard activities, and the parking structure. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table III-13, Estimated Operational Noise Levels and Composite Noise Levels for Nearest Sensitive Receptors, shows the noise levels from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. When analyzed together, the Proposed Project would have a maximum noise level of 74.69 dBA Leq for Sensitive Receptor No. 2, the proposed residential building to the south. It is anticipated that the operational activities from the Proposed Project would not be heard from Sensitive Receptor No. 1 and 3. This analysis is conservative since these noise levels represent the maximum capacities in the outdoor courtyards and the highest trip rates in the parking garage. Therefore, the Proposed Project would not increase ambient noise levels by 5 dB, and a less than significant impact would occur.

Table III-13
Estimated Operational Noise Levels and Composite Noise Levels for Nearest Sensitive Receptors

SR ID [a]	Ambient Noise Level	3rd Floor Lower Courtyard Noise Level	4th Floor Pool Deck Noise Level	8th Floor Sky Deck Noise Level	HVAC Equipment Noise Level	Parking Garage Noise Level	Composite Noise Level
1	69.2	51.03	63.63	56.78	53.96	33.70	**65.00**
2	73.5	68.48	69.65	57.33	71.00	45.74	**74.69**
3	67.5	45.48	48.26	48.57	46.92	26.65	**53.50**
4	53.1	54.13	53.23	46.09	49.15	31.67	**57.73**

Notes
[a] *See Figure III-2, Noise Monitoring and Sensitive Receptor Location Map.*
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006 and Caltrans' Technical Noise Supplement, September 2013. See Appendix F to this IS/MND for details of calculations.
Parker Environmental Consultants, 2018.

Exposure to Ambient Noise Levels

While recent court rulings[54] have found that CEQA does not require an analysis of the impacts of the environment on a project, due to the variety of land uses of the surrounding buildings in the Project vicinity, noise generated from the operation of commercial and industrial uses have the potential to impact the proposed residential uses. The Project Site is located along Sepulveda Boulevard, which is a designated Boulevard I in the City's Mobility Plan. The Project Site is also located within 500 feet west of the San Diego Freeway (I-405). In order to ensure that on-site residences would not be adversely impacted by ambient urban noise levels, all exterior windows having a line of sight of Sepulveda Boulevard shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Coefficient (STC) value of 50, as determined in accordance with ASTM E90 and ASTM E413, or any amendment thereto. The Applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room. Additionally, all dwelling units associated with the Proposed Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. The Project Applicant would be required to submit evidence to the City's Department of Building and Safety of a means of sound insulation sufficient to ensure interior noise levels below a CNEL of 45 dBA in any habitable room of the Proposed Project. With adherence to regulatory compliance measures, the future residents of the Proposed Project would not be exposed to high ambient noise levels along Sepulveda Boulevard and the San Diego Freeway.

[54] *California Building Industry Association v. Bay Area Air Quality Management District (S213478, December 17, 2015).*

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

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

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

Construction Vibration

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

Table III-14, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table III-14, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table III-14
Vibration Source Levels for Construction Equipment

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

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

Structural Damage Impacts

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. Consequently, the FTA and Caltrans adopted vibration standards for buildings which were used to evaluate potential impacts related to project construction. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table III-15, below.

Table III-15
Vibration Damage Potential Threshold Criteria

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

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

There is one structure adjacent to the Project Site that would have the potential be exposed to vibration impacts during construction: the commercial office building, located at 6733 S. Sepulveda Boulevard. The building is observed to be a concrete structure built in 1974. As shown in Table III-14, construction activities involving loaded trucks and large bulldozers would have an approximate PPV of 0.089 PPV (in/sec) within 25 feet from the source. Based on the application of the Caltrans method, the Proposed Project's construction activities would not exceed the PPV ground-borne vibration threshold level of 0.25

in/sec set forth in Table III-15, for "Historic and Some Old Buildings." Thus, the Proposed Project would not exceed the PPV groundborne vibration thresholds. Additionally, as discussed previously, this property is proposed for multi-family residential development. Therefore, the Proposed Project would not damage this adjacent existing structure because the building is proposed for demolition. The existing building would be replaced with a new residential structure that would be subject to the higher vibration threshold level of 0.5 in/sec. Therefore, vibration impacts would be less than significant. To further ensure that no vibration damage from the Proposed Project would impose on the construction of the adjacent proposed residential building to the south, the use of any construction equipment at the Project Site with the potential to generate groundborne vibration would be conducted with care and under the supervision of experienced contractors to ensure that no building damage occurs during the construction of the adjacent proposed residential building.

Moreover, protection against damage to adjacent structures is provided by existing law. Both the California Civil Code and the Los Angeles Municipal Code ("LAMC") impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction.

Operational Vibration

The Proposed Project would be a residential development with up to 180 multi-family dwelling units, which would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on Sepulveda Boulevard, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once to a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* for operational noise impacts, a project would normally have a significant impact on noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-12, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would

increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Operational Noise

Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. According to the *L.A. CEQA Thresholds Guide*, a project's mobile source impact would normally be considered significant if the project causes the ambient noise level measured at the property line of affected noise-sensitive uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or causes any 5 dBA or greater noise increase regardless of category. In order for a 3-dBA CNEL increase to occur on surrounding roadways, traffic would need to double. According to the Project's Traffic Study, the proposed development would result in 898 daily vehicle trips, including 74 AM peak hour trips, and 92 PM peak hour trips. The Proposed Project would not have the potential to double the traffic volumes on any of the 15 intersections analyzed for the Project Site. As such, the Proposed Project would not have the potential to increase roadway noise levels by 3 dBA CNEL.

To quantify the Proposed Project's mobile noise impacts on surrounding roadways, traffic noise was modeled using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels. Traffic noise was modeled under the Existing (2017) and Existing (2017) Plus Project scenarios to determine the environmental baseline and Project impact for the three nearest roadway segments to the Project Site. As shown in Table III-16, the Proposed Project would increase local noise levels by a maximum of 0.05 dBA CNEL (on Center Drive, between Sepulveda Boulevard and Park Terrace Drive), which would be inaudible/imperceptible to most people and would not exceed the 3 dBA CNEL threshold of significance at any of the study street segments. Thus, the Proposed Project would not have the potential to increase roadway noise levels by the most stringent CNEL threshold of 3 dBA set forth in the *L.A. CEQA Thresholds Guide*, and thus traffic generated noise impacts would be considered less than significant.

Stationary and Composite Noise Sources

As discussed above, the combination of outdoor courtyard activities, mechanical HVAC equipment, and operation of the parking garage would increase on-site noise sources and surrounding ambient noise levels. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table III-13, Estimated Operational Noise Levels and Composite Noise Levels for Nearest Sensitive Receptors, above, shows the noise levels

Table III-16
Noise Impacts at Roadway Segments

Roadway Segment	Noise Levels in dBA CNEL			
	FHWA-RD-77-108 Modeled Noise Levels			Significant Impact
	Existing (2017) Without Project Traffic Volumes	Existing Plus Project Traffic Volumes	Increase	
1. Sepulveda Boulevard, between Centinela Ave. and Center Dr.	70.20	70.23	0.03	No
2. Center Drive, between Sepulveda Blvd. and Park Terrace Dr.	58.58	58.63	0.05	No
3. Sepulveda Boulevard, between Center Dr. and Howard Hughes Ctr.	69.92	69.95	0.03	No

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table III-12, Community Noise Exposure (CNEL)).
Calculation roadway noise levels data and results using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes are provided in Appendix F to this IS/MND.
Traffic data provided by The Mobility Group, September 20, 2017.

from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. When analyzed together, the Proposed Project's composite noise levels would range from 53.50 dBA Leq to a maximum noise level of 74.69 dBA Leq for Sensitive Receptor No. 2, the proposed residential building to the south. This analysis is conservative since these noise levels represent the maximum capacities in the outdoor courtyards and the highest trip rates in the parking garage. Therefore, the Proposed Project would not permanently increase ambient noise levels by more than 5 dBA, and a less than significant impact would occur with respect to substantial permanent increase in noise levels at nearby sensitive receptors.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

As discussed above, impacts are expected to be mitigated to less than significant levels for construction noise and vibration, and operational noise and vibration. Implementation of Mitigation Measures N-1 through N-6 would reduce the Proposed Project's substantial temporary or periodic increase in ambient

noise levels in the Project vicinity during the construction phase, and any impacts would be mitigated to less than significant levels.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. The closest airport to the Project Site is the Los Angeles International Airport (LAX), approximately two miles south of the Project Site. The Project Site is not located within an airport land use plan. Further, the Project Site does not fall within the jurisdiction of the Airport Land Use Commission (ALUC) and would not be subject to the land use compatibility standards of the Airport Land Use Plan.[55] The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, impacts from exposure to airport noise would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to excessive noise levels. The Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Cumulative Impacts

Potentially Significant Unless Mitigation Incorporated. Development of the Proposed Project in conjunction with the 21 related projects identified in Section II, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. While the Proposed Project's potential noise impacts are less than significant following mitigation, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Proposed Project, could result in a cumulatively significant noise impact.

The closest related project site (Related Project No. 5) is immediately adjacent to the Project Site, located at 6733 S. Sepulveda Boulevard. This related project has the potential to have concurrent construction activities. Each of the related projects, including Related Project No. 5 would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA

[55] *Los Angeles County, Airport Land Use Commission (ALUC), Los Angeles International Airport, Airport Influence Area, May 13, 2003.*

provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be mitigated to less than significant levels.

With respect to structural groundborne vibration impacts, the Proposed Project's groundborne vibration impacts was determined to be less than significant at the nearest adjacent structures, with the exception of the adjacent building, located at 6733 Sepulveda Boulevard (Related Project No. 5). Since it is likely that this related project's construction would have concurrent construction with the Proposed Project, no other buildings are adjacent to the Project Site and this property. Therefore, cumulative structural groundborne vibration impacts would be considered less than significant.

For purposes of analyzing the Proposed Project's cumulative traffic noise impacts, the roadway noise levels were modeled using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise was modeled under the Existing (2017) base year conditions without the Project and Future (2020) Plus Project conditions to determine the Project's incremental cumulative roadway noise impacts, respectively. As shown in Table III-17, the cumulative roadway noise would result in a less than 3 dBA CNEL noise increase at all of the analyzed roadway segments. The maximum increase in noise level would be 0.67 dBA CNEL (on Sepulveda Boulevard, between Centinela Avenue and Center Drive), which would be inaudible/imperceptible to most people and would not exceed the 3 dBA CNEL threshold of significance. Thus, the Proposed Project and related projects would not have the potential to increase roadway noise levels by the most stringent CNEL threshold of 3 dBA set forth in the *L.A. CEQA Thresholds Guide*, and thus cumulative traffic generated noise impacts would be considered less than significant.

Table III-17
Cumulative Noise Impacts at Roadway Segments

Roadway Segment	Noise Levels in dBA CNEL			
	FHWA-RD-77-108 Modeled Noise Levels			Significant Impact?
	Existing (2017) Without Project Traffic Volumes	Future (2020) Plus Project Traffic Volumes	Cumulative Impact	
1. Sepulveda Boulevard, between Centinela Ave. and Center Dr.	70.20	70.87	0.67	No
2. Center Drive, between Sepulveda Blvd. and Park Terrace Dr.	58.58	59.22	0.64	No
3. Sepulveda Boulevard, between Center Dr. and Howard Hughes Ctr.	69.92	70.58	0.66	No

Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table III-12, Community Noise Exposure (CNEL)).
Calculation roadway noise levels data and results using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes are provided in Appendix F to this IS/MND.
Traffic data provided by The Mobility Group, September 20, 2017.

XIII. POPULATION AND HOUSING

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

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

Southern California Association of Governments (SCAG)

Southern California Association of Governments is a Metropolitan Planning Organization that is comprised of six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

2008 Regional Comprehensive Plan

In October 2008, SCAG approved and adopted the "2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future" (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality of life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region's mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

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

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons, 1,325,500 residences, and 1,696,400 jobs in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to approximately 4,609,400 persons (20% increase since the year 2012), 1,690,300 residences (28% increase since the year 2012) and 2,169,100 jobs (28% increase since the year 2012). SCAG's population, housing, and employment projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table III-18, below.

On a policy level, the Proposed Project would be consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above, as the Proposed Project would revitalize an underutilized property in an existing commercial area. The Proposed Project is an infill development project within the Westchester-Playa del Rey Community Plan Area of the City of Los Angeles. With respect to

regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As shown in Table III-18, SCAG Population and Housing Projections for the City of Los Angeles and the SCAG Region, the forecast from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) and 3,816,000 additional persons (an approximate 21% growth rate), respectively. The number of households within the City is Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. By 2040, the City of Los Angeles is expected to experience a 20% population growth, 28% household unit growth. SCAG has forecasted that the total employment growth for the City of Los Angeles would increase by approximately 472,700 jobs between 2012 and 2040, and a 28% employment growth as compared to the 2012 values.[56] SCAG anticipates that employment opportunities in the SCAG region would increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Table III-18
SCAG Population, Housing, and Employment Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	3,845,500	4,609,400	20%
Los Angeles County [b]	9,923,000	11,514,000	16%
SCAG Region [b]	18,322,000	22,138,000	21%
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,325,500	1,690,300	28%
Los Angeles County [b]	3,257,000	3,946,000	21%
SCAG Region [b]	5,885,000	7,412,000	26%
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,696,400	2,169,100	28%
Los Angeles County [b]	4,246,000	5,226,000	23%
SCAG Region [b]	7,440,000	9,872,000	33%

Sources:
[a] *SCAG, 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.*
[b] *SCAG, 2016 RTP/SCS Growth Forecast, adopted April 2016.*

[56] *SCAG, adopted 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.*

Westchester – Playa del Rey Community Plan Projections and Capacity

Existing residential land use patterns in the Westchester-Playa del Rey Plan Area include single family and multiple family dwellings. The densities vary from the low to high medium land use categories of the General Plan. Single-family neighborhoods are located widely throughout the area north of Manchester Avenue, while south of the bluffs, including Kentwood, Loyola Village, and portions of Playa Vista and Playa del Rey. Concentrations of higher density and multiple-family residential uses are located in the Playa Vista area, in Playa del Rey, along Manchester Avenue between Pershing Drive and Ramsgate Avenue, near La Tijera Boulevard and Centinela Avenue. Approximately 2,381 acres are designated for residential uses. Of that amount, 73 percent is designated for Single-Family residential uses. However, more than 49 percent of the existing dwelling units are in the Multiple-Family designations. Nearly all of the housing stock has been built in the post World War II era.

The Westchester-Playa del Rey Community Plan projects a 2010 population for the Community Plan area of approximately 103,520 persons and identifies a population capacity of 87,779 persons. The Westchester-Playa del Rey Community Plan also projects 46,950 housing units by 2010 and a capacity of 39,333 households. The projected figures for population and dwelling units exceed the estimates of Plan capacity. Regional forecasts do not always reflect the adopted Community Plan land use capacity or buildout, as estimated from planned land use. Plan capacity or buildout is an estimate and depends on specific assumptions about future density of development and household size which may be greater or smaller than that which actually occurs. Additional population and dwelling units would be accommodated through various means that are not included in the plan capacity estimate. Up to 60 percent of multi-family units in some parts of the City are located in commercial zones, including the new Residential Accessory Services (RAS) zones that encourage residential and mixed use development. A density bonus of up to 35 percent is also available through the provision of affordable housing. The total population figure for the community also includes approximately 2,900 students and faculty/staff residing on the campus of Loyola Marymount University.

2015 Growth and Infrastructure Report

The General Plan's Framework Element provides citywide guidelines and a foundation in which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies on. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units.

The 2015 Growth and Infrastructure Report is a program of the Framework Element to provide detailed information on the City's demographics, development activity, infrastructure and public facilities and provides a basis for evaluating the City's progress towards meeting goals and policies of the General Plan. The Report discusses population, housing, and employment growth since the 2010 Census. The 2015 Growth and Infrastructure Report states that the Westchester-Playa del Rey Community Plan Area had an actual population of 55,073 persons and 25,267 housing units in 2010 based on the 2010 U.S. Census. The 2015 Growth and Infrastructure Report estimates that the Westchester-Playa del Rey Community Plan area

has approximately 59,446 persons and 27,753 housing units in 2015.[57]

Table III-19 below compares the population, housing, and employment values for the Westchester-Playa del Rey Community Plan area.

Table III-19
Population and Housing Data for the Westchester – Playa del Rey Community Plan Area

	Westchester – Playa del Rey Community Plan Capacity [a]	Framework Element (Projected for 2010) [a]	2010 U.S. Census (Actual for 2010) [b]	2015 Growth and Infrastructure Report (Estimates for 2015) [b]
Population (persons)	87,779	103,520	55,073	59,446
Housing (dwelling units)	39,333	46,950	25,267	27,753

Sources:
[a] *City of Los Angeles, Department of City Planning, Westchester-Playa del Rey Community Plan, April 13, 2004.*
[b] *City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, November 2016.*

The Proposed Project

The Project Site currently contains a vacant self-storage facility and its associated surface parking lot. The Proposed Project would include the demolition of the existing structure for the construction and development of an eight-story residential building with 180 dwelling units along Sepulveda Boulevard.

Population

Based on the Westchester-Playa del Rey Community's current household demographics (e.g., an average of 1.93 persons per multi-family household), the construction of up to 180 multi-family dwelling units would result in an increase of approximately 347 net permanent residents in the City of Los Angeles.[58]

The Proposed Project's increase in population would be consistent with the SCAG forecast of approximately 763,900 persons in the City of Los Angeles between 2012 and 2040. According to the Framework Element, the population within the Westchester-Playa del Rey Community Plan area was projected to increase to 103,520 persons by 2010.[59]

The 2010 United States Census documented an actual population of 55,073 persons in 2010.[60] The 2010 Census data shows that the actual population in the Westchester-Playa del Rey Community Plan area was

[57] *City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, November 2016.*
[58] *Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Westchester-Playa del Rey Community Plan Area, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wch&sgo=ct&rpt=PnH&yrx=Y09, accessed October 2017.*
[59] *City of Los Angeles, Westchester-Playa del Rey Community Plan, April 13, 2004, pg. II-4.*
[60] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 2016.*

lower than projected by the Framework Element and the capacity shown in the Westchester-Playa del Rey Community Plan. Further, the 2015 Growth and Infrastructure Report estimates that 59,446 persons reside within the Westchester-Playa del Rey Community Plan area in 2015, which is also under the Framework Element's projected population for 2010. Therefore, there is a remaining capacity for population growth of approximately 44,074 persons to reach the 2010 anticipated growth projection discussed in the Framework Element for the Westchester-Playa del Rey Community and approximately 28,333 persons to reach the population capacity discussed in the Westchester-Playa del Rey Community Plan. The addition of approximately 347 permanent residents generated by the Proposed Project would be within population growth projections for the Westchester-Playa del Rey Community Plan. The population growth projections are also within SCAG's regional growth projections. A less than significant impact would occur with regards to population growth.

Housing

The Housing Element (2013) of the General Plan states that the City anticipates that a minimum of 308,052 units can be built on the 21,336 parcels identified in the Inventory of Sites in the Housing Element, in addition to what currently exist on these lots.[61] Therefore, the City has the capacity to accommodate more housing units for anticipated population growth. The Proposed Project is consistent with the City's goals of increasing residential development near retail and services and within a transit-rich area. The Proposed Project would increase the variety of housing stock available for the local population, decrease vehicles per miles, and place residents close to mass transit and employment opportunities. The Proposed Project would not remove any existing dwelling units or displace any residents. Additionally, as discussed above, the Project's addition of up to 180 dwelling units is consistent with SCAG's growth projections and the Framework Element's projections for the Westchester-Playa del Rey Community Plan area.

According to the Framework Element, the housing units within the Westchester-Playa del Rey Community Plan area were projected to increase to 46,950 housing units by 2010.[62] The 2010 United States Census documented an actual housing stock of 25,267 housing units in 2010.[63] The 2010 Census data shows that the actual amount of dwelling units in the Westchester-Playa del Rey Community Plan area was lower than projected. Further, the 2015 Growth and Infrastructure Report estimates that 27,753 housing units exist within the Westchester-Playa del Rey Community Plan area in 2015, which is also lower the Westchester-Playa del Rey Community Plan's projected population for 2010. Therefore, as discussed above, the Community Plan area has room for housing growth based on the housing capacity for the year 2010. The Proposed Project would be consistent with the Community Plan's goal of providing more affordable housing units and preserving existing housing capacity in the City. In addition, the Proposed Project's increase in housing units would be consistent with the SCAG forecast of 364,800 additional households in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would result in a less than

[61] *Department of City Planning, Housing Element 2013-2021, Chapter 3: Inventory of Sites for Housing, pg 3-6, adopted December 3, 2013.*
[62] *City of Los Angeles, Westchester-Playa del Rey Community Plan, September 16, 1997, pg. II-4.*
[63] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 2016.*

significant impact with regards to housing units.

Employment

The Proposed Project does not propose any employee-generating land uses, such as office, commercial, or industrial uses. Therefore, the Proposed Project would not generate any employment growth and would therefore be within SCAG's employment growth forecast for the City of Los Angeles.

As further discussed in Section X, Land Use and Planning, the Proposed Project would be consistent with the Westchester-Playa del Rey Community Plan. As such, the Proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment. The Proposed Project would not introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Therefore, Project impacts related to population, housing, and employment would be less than significant.

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

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of a residential building on a site that is currently occupied by a vacant self-storage building and its associated surface parking lot. As such, the Proposed Project would not displace any existing housing. The proposed residential land uses would be consistent with the allowable uses as permitted by the zoning and General Plan land use designations. Therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The Proposed Project would consist of the development of a residential building on a site that is currently occupied by a vacant self-storage building and its associated surface parking lot. No displacement of existing housing would occur with the development of the Proposed Project. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the City of Los Angeles and Culver City. Any residential related projects would result in direct population growth in the City of Los Angeles and Culver City. As shown in Table III-20, the Proposed Project and related projects that involve residential developments would cumulatively contribute 1,497 new residential dwelling units to the Westchester - Playa del Rey Community Plan area, generating approximately 2,889 new residents to the City of Los Angeles. The addition of these related projects would still be within the projected residents and housing units proposed for 2010 for the Community Plan area, as shown in Table

Table III-20
Estimated Cumulative Residents and Housing Units

Related Projects (By Housing Type)	Total Housing Units	Total Residents [a, b]
City of Los Angeles		
Apartments	1,317	2,542
City of Los Angeles Related Projects Total:	***1,317***	***2,542***
Proposed Project Net Total:	180	347
City of Los Angeles Cumulative Total:	**1,497**	**2,889**
City of Culver City		
Condominiums	215	503
Culver City Total:	**215**	**503**
SCAG Region Cumulative Total:	**1,712**	**3,392**

Source:
[a] *Based on a generation rate of 1.93 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Westchester - Playa del Rey Community Plan Area, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wch&sgo=ct&rpt=PnH&yrx=Y09, accessed October 2017.*
[b] *Based on a generation rate of 2.34 residents per household. U.S. Census Bureau, Quickfacts, Culver City, California. Website: https://www.census.gov/quickfacts/fact/table/culvercitycitycalifornia/PST045216, accessed January 2018.*

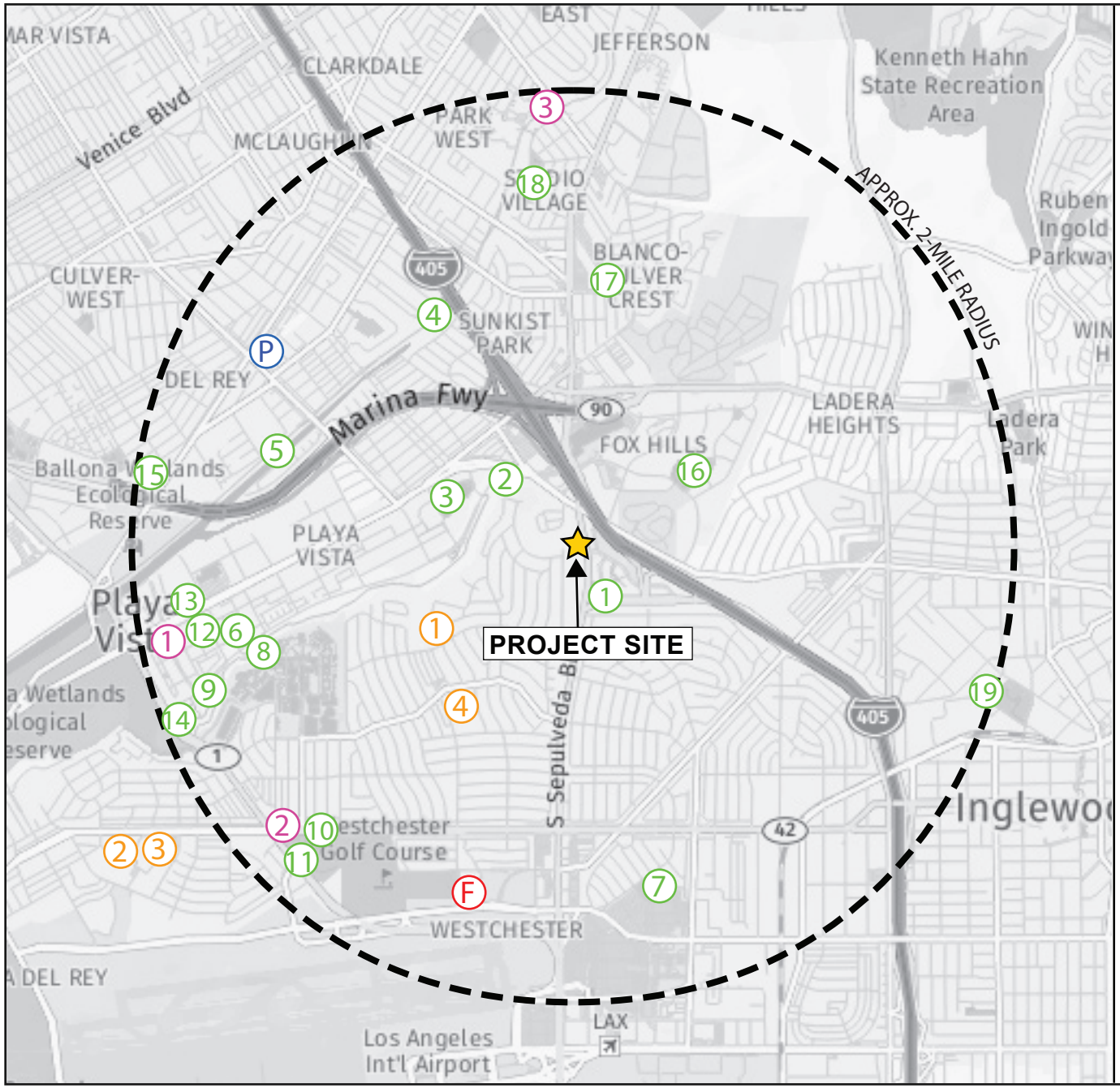
III-19 above. With the estimated housing units and residents in Culver City, the Proposed Project and related projects would contribute to a total of 1,712 housing units and approximately 3,392 residents to the SCAG region.

As discussed in Checklist Question XIII(a), the Proposed Project would not exceed the growth projections of SCAG's 2016 RTP/SCS for the City of Los Angeles subregion. Furthermore, the Proposed Project is the type of project encouraged by SCAG and City policies, as the Proposed Project would promote and help accommodate growth in urban centers that are close to existing employment centers and mass transit. Because the Proposed Project would not displace any residents, and population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

XIV. PUBLIC SERVICES

The location of public services (including fire services, police protection services, schools, parks, and libraries) in the Project vicinity and that service the Project Site are shown in Figure III-3, below.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:



LEGEND

- (F) LAFD Station No. 5
- (P) Pacific Community Police Station
- (#) Parks

City of Los Angeles

1. The Triangle Park
2. Steve Soboroff Court Park
3. Central Park
4. Culver Slauson Park / Rec Center
5. Milton Street Park
6. Oberrieder Park
7. Carl E. Nielsen Youth Park
8. Celadon Park
9. Concert Park
10. Westchester Park and Rec Center
11. Westchester Senior Center and Pool
12. Ballona Discovery Park
13. Longwood Park
14. Playa Vista Sport Park
15. Glen Alla Park

City of Culver City

16. Fox Hills Park
17. Blanco Park
18. Lindberg Park
19. Rogers Park

(#) Libraries

1. Playa Vista Branch Library
2. Westchester - Loyola Village Branch Library
3. Culver City Julian Dixon Library (Los Angeles County Library Facility)

(#) Schools *

1. Cowan Avenue Elementary School
2. New Middle School Pathway
3. Westchester Enriched Science Magnets
4. Orville Wright Engineering and Design Magnet

Source: Yahoo Maps, 2017.

** Note: Only LAUSD Resident Schools were considered, since Resident Schools would serve the Project Site.*

PARKER ENVIRONMENTAL CONSULTANTS

Figure III-3
Public Services in the Project Site Vicinity

(i) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.[64]

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2014 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. Minimum fire flow requirement for high-density residential land uses is 4,000 gallons per minute (gpm) from four adjacent hydrants flowing simultaneously.[65] If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

Construction

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

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site during construction through marked emergency

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

[65] *2014 City of Los Angeles Fire Code, page 92.*

access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. Construction of the Proposed Project would result in a less than significant impact to fire protection services.

Operation

The Proposed Project would include the development of up to 180 multi-family dwelling units which would provide up to 347 new residents, which would increase the demand for LAFD services. The Project Site is served by LAFD Station No. 5 located at 8900 South Emerson Avenue, located approximately 2.1 miles (driving distance) south of the Project Site. Fire Station No. 5 is equipped with a task force and paramedic ambulance. A task force includes an engine company and a truck company. Based on the response distance criteria specified in LAMC 57.507.3.3 and the distance from Fire Station No. 5 to the Project Site, fire protection response distance would be exceeded. Since the distance is exceeded, the Proposed Project would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Project Site is located beyond the maximum response distance.

Furthermore, the adequacy of existing water pressure and water availability in the Project area would be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. As discussed further in Section XVI (e), development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Further, the Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the Proposed Project, the Project Applicant would submit a plot plan for review and approval by the LAFD prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street, approved fire lane, or a standpipe within the building. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 21 related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. This need would be funded via existing mechanisms (e.g., property taxes, government funding) to which the Proposed Project and related projects

would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to review by the Fire Department and would be required to comply with all applicable fire safety requirements in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as there are no 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 Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

(ii) Police Protection?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.[66] The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is located in the Pacific Area division of the LAPD's West Bureau. The Pacific Area community is 25.74 square miles in size and has over 200,000 residents. Neighborhoods located in the Pacific area include Venice Beach, Oakwood, Mar Vista, Playa del Rey, Playa Vista, Palms, and Westchester.[67] The Pacific Area is served by the Pacific Community Police Station, located at 12312 Culver Boulevard, approximately 2.1 miles (driving distance) northwest of the Project Site. Within the Pacific Area, the Proposed Project is located within Reporting District (RD) 1466.[68] RD 1466 includes the

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

[67] *Los Angeles Police Department, About Pacific, website: http://www.lapdonline.org/pacific_community_police_station/content_basic_view/1600,* accessed October *2017.*

[68] *Los Angeles Times Local, Mapping L.A. LAPD Pacific Division, Reporting District 1466, website: http://maps.latimes.com/lapd/reporting-district/1466/, accessed October 2017.*

communities of Culver City, Playa Vista, and Westchester. Table III-21, Pacific Community Police Station Crime Statistics, below, shows the year to date crime statistics for the Pacific Community Police Station service area.

Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. The Proposed Project would incorporate temporary construction fencing 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 (refer to Mitigation Measure PS-1, below).

Operation

The development of the Proposed Project would result in an increase of on-site residents and visitors to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities as outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design." Such design considerations would be reviewed and verified for compliance during the Site Plan review process. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project residents and guests would be able to monitor suspicious activity at the building entry points.

With implementation of Mitigation Measure PS-1 provided below, the Proposed Project's impacts upon LAPD services would be less than significant.

Mitigation Measures:

PS-1 Public Services (Police – Demolition/Construction Sites)

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

Table III-21
Pacific Community Police Station Crime Statistics

Crimes	2017 [a] (Year to Date)	2016 (Year to Date)	2015 (Year to Date)
Violent Crimes			
Homicide	4	5	10
Rape	63	68	82
Robbery	220	275	225
Aggravated Assault	407	418	385
Total Violent Crimes	**694**	**766**	**702**
Property Crimes			
Burglary	837	858	871
Motor Vehicle Theft	799	775	765
BTFV	1,442	1,432	1,420
Personal / Other Theft	1,925	2,009	2,054
Total Property Crimes	**5,003**	**5,074**	**5,110**
Total Part 1 Crimes	**5,697**	**5,840**	**5,812**
Child / Spousal Abuse (Part I & II) [b]	430	342	324
Shots Fired	26	34	42
Shooting Victims	12	14	26

Notes:
[a] *Crime Statistics for week ending October 21, 2017.*
[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part 1 Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*
Source: LAPD, COMPSTAT Unit, Pacific Area Profile, website: http://assets.lapdonline.org/assets/pdf/pacprof.pdf, accessed October 2017.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project area. Specifically, there may be an increased demand for additional police 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 Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to review and would be required to comply with all applicable safety requirements of their respective City and police station 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 area, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as there are no current 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 Proposed

Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be 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 a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available (consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand); (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project Site is located in LAUSD Board District 4. The Project Site is currently served by one elementary school, one middle school, and two high schools. Table III-22, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table III-22
Resident Schools Serving the Project Site

School Name	Grades	Address
Cowan Avenue Elementary School	K-5	7615 Cowan Avenue
New Middle School Pathway	6-7	8701 Parkhill Drive
Orville Wright Engineering and Design Magnet	6-8	6550 W. 80th Street
Westchester Enriched Sciences Magnets (includes S.T.E.A.M. Magnet, Environmental and Natural Science Magnet, and Health and Sports Medicine Magnet)	9-12	7400 W. Manchester Avenue
Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed October 2017.		

As shown in Table III-23, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 30 elementary students, eight middle school students, and 17 high school students, for a total of approximately 55 students. The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of a School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

Table III-23
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Proposed Project					
Multi-Family Residential [a]	180 du	30	8	17	55
Total Project Estimated Students		**30**	**8**	**17**	**55**

Notes: du = dwelling units
[a] *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*
Source: Los Angeles Unified School District, School Facilities Needs Analysis, September 2012.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. As shown in Table III-24, Estimated Cumulative Student Generation, the Proposed Project and related projects would cumulatively contribute approximately 333 elementary school students, 105 middle school students, and 182 high school students, for a total of approximately 620 students. This would create an increased cumulative demand on local school districts. However, as shown in Table II-6, in the Project Description section, there are two schools proposed in close proximity to the Project Site that would decrease the demand on school services (Related Project No. 6 and 9). Additionally, each of the related projects would be responsible for paying applicable school fees to mitigate the increased demand for school services. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, the related projects and the Proposed Project's cumulative impacts on schools would be less than significant.

(iv) Parks?

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

Table III-24
Estimated Cumulative Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Single-Family Attached [a]	215 du	11	3	7	21
Multi-Family Residences [b]	1,317 du	217	59	124	400
Hotel (105,225 sf) [c]	183 rooms	1	1	1	3
Office [d]	2,973,809 sf	69	32	31	132
Retail/Commercial [e]	299,146 sf	5	2	2	9
Related Projects Total:		**303**	**97**	**165**	**565**
Proposed Project Net Total:		30	8	17	55
Cumulative Total:		**333**	**105**	**182**	**620**

Notes: sf = square feet; du = dwelling units
-Uses not listed are estimated by the closest type of use available in the table.
-As a conservative estimate, it was assumed that related projects located in Culver City would utilize the LAUSD schools.
[a] *Student generation rates are as follows for single-family attached residential uses: .053 elementary, .0145 middle and .0303 high school students per unit.*
[b] *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*
[c] *Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf.*
[d] *Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.*
[e] *Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.*
Sources:
-For bullet points (a) and (b) above: Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.
-For bullet points (c) through (e) above: Los Angeles Unified School District, School Fee Justification Study, September 2002.
-Conversions of square feet per occupant are based on California Building Code (2016), Ch.10, Table 1004.1.2.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. The Recreation Plan notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

The Proposed Project is located within a highly urbanized area within the Westchester – Playa del Rey Community Plan Area. As shown in Table III-25, there are a total of 19 parks that equate to over 94 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. As discussed in Checklist Question XII (a), it is estimated that the development of the Proposed Project would result in an increase of 347 new residents to the area. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with

Table III-25
Recreation and Park Facilities within the Project Area

Park Name	Park Size (acres)	Park Amenities	Distance to Project Site (miles)
City of Los Angeles			
1. The Triangle Park	1.5	Volleyball courts, open space	0.20
2. Steve Soboroff Court Park	2.5	Children's play areas, walking paths, picnic tables, basketball courts, multi-purpose fields, tennis court	0.42
3. Central Park at Playa Vista	8.0	Soccer fields, basketball courts, amphitheater, woodlands, walking paths, water features	0.62
4. Culver/Slauson Park and Recreation Center	3.2	Barbecue pits, basketball courts, children's play area, and picnic tables	1.21
5. Milton Street Park	1.3	Benches, walking path	1.44
6. Oberrieder Park	2.2	Basketball courts, tennis courts, multi-purpose fields,	1.50
7. Carl E. Nielson Youth Park	8.4	Soccer fields, baseball diamond, open space, multi-purpose fields	1.55
8. Celadon Park	0.5	Walking path	1.60
9. Concert Park	1.6	Amphitheater, open space	1.69
10. Westchester Recreation Center and Pool	23.6	Skate park, tennis courts, two indoor gyms, picnic areas with barbecue pits, baseball diamonds, multi-purpose field, basketball court, children's play area, and pool	1.79
11. Westchester Senior Center and Pool		Senior citizen programs, auditorium, stage, lending library, seasonal pool (outdoor/unheated)	1.79
12. Ballona Discovery Park	2.0	Walking paths, amphitheater	1.79
13. Longwood Park	0.4	Dog park, benches	1.86
14. Playa Vista Sport Park	6.5	Basketball courts, tennis courts, multi-purpose fields, baseball diamond, children's play area	1.98
15. Glen Alla Park	4.8	Children's play area, multi-purpose field, tennis courts, basketball court, and picnic area	2.00
City of Culver City			
16. Fox Hills Park	10.1	Children's play area, open space, tennis courts, volleyball courts, basketball court	0.50
17. Blanco Park	3.3	Multi-purpose field	1.17
18. Lindberg Park	5.0	Multi-purpose field, open space, children's play area, handball court, picnic area	1.57
19. Rogers Park	9.4	Baseball diamond, basketball court, tennis courts, children's play area	2.00
TOTAL:	**94.3**		

Sources: Park distances, size, and amenities were determined using:
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/; and
(2) Navigate LA, http://navigatela.lacity.org/navigatela/, and
(3) Google Earth, accessed October 2017.

approximately 1.39 acres of additional public parkland. The Proposed Project would contribute towards the achievement of such goal through a combination of (1) on-site open space proposed within the Project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area. The LAMC requires the Proposed Project to provide 18,425 square feet of open space. As a Density Bonus on-menu incentive, the Applicant requests a 20 percent reduction in open space, which would require 15,540 square feet of open space. The Proposed

Project would provide approximately 15,540 square feet of total open space and amenities on-site available to serve Project residents and their guests. The Proposed Project would include a variety of on-site amenities including, but not limited to: a dog walking area, an outdoor courtyard and lounging area, barbecue pit, fire pit, a pool deck, community room, a sky deck, and balconies. With approval of an open space reduction, the Proposed Project would achieve the required square feet of open space required by the LAMC.

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

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects could result in an increase of 3,392 new permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Quimby Fees (for subdivision projects with greater than 50 units) and/or park mitigation fees (for all other residential projects). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative 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 available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library and 72 regional branch libraries. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

1) Westchester - Loyola Village Library, located at 7114 W. Manchester Avenue, approximately 1.8 miles southwest of the Project Site; and
2) Playa Vista Library, located at 6400 Playa Vista Drive, approximately 1.9 miles west of the Project Site.[69]

Additionally, the Culver City Julian Dixon Library, which is a Los Angeles County Library, is located approximately 2 miles north of the Project Site. The Proposed Project would result in an increase of approximately 347 residents. The three libraries within a 2-mile radius of the Project Site currently meet the library demands of the surrounding community and are anticipated to meet the Proposed Project's demand for library services, since no libraries are currently proposed in the Project area. Additionally, the Proposed Project would provide a business center and/or conference room with computer stations for residents to use, which would reduce demands on local libraries. Therefore, the Proposed Project's impacts upon library services would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the related projects is projected to generate an additional 1,712 housing units and 3,392 new residents to the Project area, which would likely generate additional demands upon library services. This increase in resident population, combined with the 347 additional residents generated by the Proposed Project, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Thus, the 347 additional residents generated by the Proposed Project would not make a cumulatively considerable impact upon the City's library system. Therefore, the cumulative impacts related to library facilities would be reduced to a less than significant level.

XV. RECREATION

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. Based on the *L.A. CEQA Thresholds Guide*, the

[69] *City of Los Angeles Public Library, Hours and Locations, website: http://www.lapl.org/branches, accessed October 2017.*

determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

It is reasonable to assume that the future residents of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table III-25, above, there are 19 parks within two miles of the Project area totaling more than 94 acres that are available to serve the future residents of the Project Site. Given the numerous recreation and park facilities available to the Project's future residents, the marginal incremental increase in usage at any one particular facility resulting from the Project would not be anticipated to cause or accelerate a substantial physical deterioration of the facility. The Proposed Project would also provide 15,540 square feet of open space. Common open space would be attractively landscaped and provide a variety of amenities. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Further, the Proposed Project would be subject to Ordinance 184,505, which requires the payment of park mitigation fees for residential, non-subdivision projects. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 19 parks within two miles of the Project area totaling more than 94 acres that are available to serve the future residents of the Project Site. The Proposed Project would provide 15,540 square feet of open space. Common open space would be attractively landscaped and provide a variety of amenities. As discussed in Section XIV (iv) above, Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. Section 15355 of the State CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound

or increase other environmental impacts." As discussed above, the Proposed Project would have a less than significant impact on recreational resources. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles and Culver City. The related projects that include residential units would be required to pay park mitigation fees, and/or applicable Quimby fees, as may be applicable to each project, to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the applicable municipal code for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

XVI. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates the reference information provided in the 6711 Sepulveda Project Traffic Study, prepared by The Mobility Group, dated September 20, 2017; and the Traffic Assessment for the Proposed 180 Dwelling Unit Residential Apartment Building Located at 6711 South Sepulveda Boulevard (LADOT Case No. CTC17-105906), prepared by Los Angeles Department of Transportation, dated September 27, 2017. The Traffic Study and related correspondence from the Los Angeles Department of Transportation (LADOT) are provided as Appendix G.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Unless Mitigation Incorporated.

Study Scope

The Project Site is located in the City of Los Angeles. The Los Angeles Department of Transportation (LADOT) is the lead reviewing agency, and the scope and methodology of this analysis was determined in conjunction with the LADOT and conducted in accordance with the LADOT Traffic Study Guidelines. The study area also includes intersections in the City of Culver City. Staff from the City of Culver City were also contacted and the analysis methodologies utilized by those jurisdictions, if different from those employed by LADOT, were incorporated into the Traffic Study as necessary.

The analysis addresses the following time periods:

- AM peak hour
- PM peak hour

The analysis also addresses the following scenarios:

- Existing Conditions
- Future Without Project Conditions
- Future With Project Conditions
- Existing With Project Conditions

The analysis assumes completion of the Proposed Project by early 2020. The impact analysis therefore addresses the year 2020 for the Future Without Project and Future with Project Conditions.

Existing Conditions

Roadway System

Regional Access

The Project Site is located in the western part of the City of Los Angeles, close to Playa Vista and the City of Culver City. The Project Site is proximate to two freeways; the San Diego freeway (1- 405), and the Marina Freeway (SR-90).

North-South Streets

The key streets located in the area of the Project Site are as follows:

Sepulveda Boulevard: Sepulveda Boulevard is a two-way street providing four travel lanes in the northbound direction and three travel lanes in the southbound direction, immediately to the east of the Project Site. It is classified as a Boulevard I in the City of Los Angeles Mobility 2035 Plan, and a Primary Artery in the City of Culver City Circulation Element. On- street parking is generally restricted on both sides of the street.

Bristol Parkway: Bristol Parkway is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site. It is located in the City of Culver City, and is classified as a Secondary Artery in the City of Culver City Circulation Element. On-street parking is generally provided on the east side of the street and is restricted on the west side of the street.

East-West Streets

Center Drive: Center Drive is a two-way street providing two travel lanes in each direction to the east of the Project Site. It is classified as a Local Street in the City of Los Angeles Mobility 2035 Plan. On-street parking is generally restricted on both sides of the street.

Howard Hughes Parkway: Howard Hughes Boulevard is a two-way street providing three travel lanes in the westbound direction and two travel lanes in the eastbound direction. It is classified as a Boulevard II in the City of Los Angeles Mobility 2035 Plan. On-street parking is generally restricted on both sides of the street.

Jefferson Boulevard: Jefferson Boulevard is a two-way street to the west of the Project Site and it is classified as a Boulevard II in the City of Los Angeles Mobility 2035 Plan, and a Primary Artery in the City

of Culver City Circulation Element. It consists of three travel lanes in the eastbound direction and two travel lanes in the westbound direction, with on-street parking generally restricted on both sides of the street.

Centinela Avenue: Centinela Avenue is a two-way street providing four travel lanes in the eastbound direction and three travel lanes in the westbound direction, to the north of the Project Site. It is classified as a Boulevard II in the City of Los Angeles Mobility 2035 Plan, and a Primary Artery in the City of Culver City Circulation Element. On-street parking is generally provided on both sides of the street with some restrictions.

76th Street: 76th Street is a two-way street providing two travel lanes in each direction to the south of the Project Site. It is classified as a Local Street in the City of Los Angeles Mobility 2035 Plan. On-street parking is generally provided on both sides of the street.

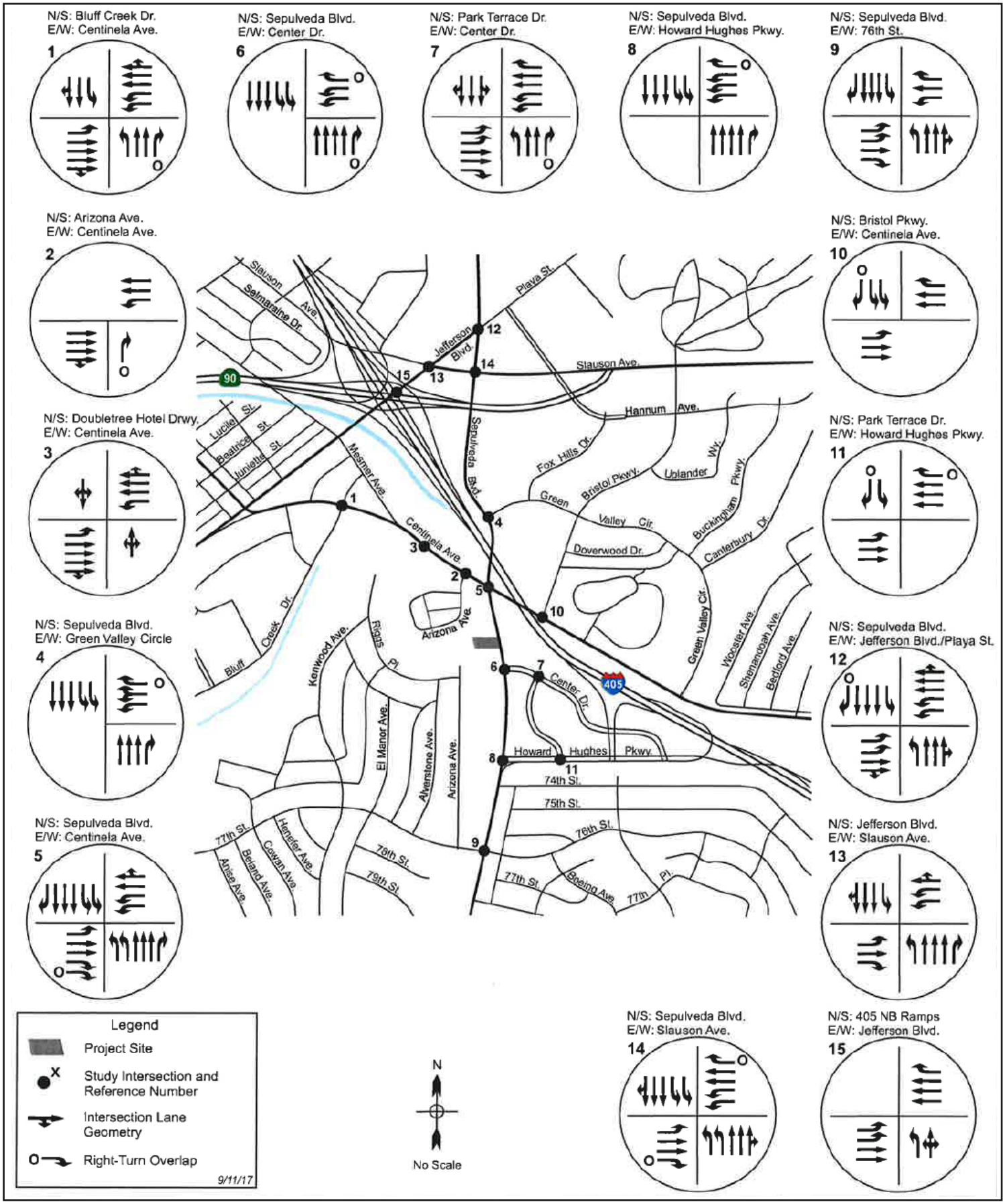
Green Valley Circle: Green Valley Circle is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site. It is located in the City of Culver City, and is classified as a Secondary Artery in the City of Culver City Circulation Element. On-street parking is generally provided on both sides of the street.

Slauson Avenue: Slauson Avenue is a two-way street providing three travel lanes in each direction in the vicinity of the Project Site. It is located in the City of Culver City, and is classified as a Primary Artery in the City of Culver City Circulation Element. On-street parking is generally restricted on both sides of the street.

Study Intersections

A total of fifteen study intersections were identified, in conjunction with LADOT and Culver City staff for inclusion in the traffic analysis. The analyzed locations are shown in Figure III-4 and correspond to locations where potential traffic impacts from the Proposed Project are most likely to occur. A total of six (6) study intersections are located in the City of Los Angeles, and a total of nine (9) study intersections are located in the City of Culver City. The existing lane configurations for the fifteen analyzed intersections are also shown in Figure III-4.

1. Centinela Avenue and Bluff Creek Drive (City of Los Angeles)
2. Centinela Avenue and Arizona Avenue (City of Culver City)
3. Centinela Avenue and Doubletree Hotel Driveway (City of Culver City)
4. Sepulveda Boulevard and Green Valley Circle (City of Culver City)
5. Sepulveda Boulevard and Centinela Avenue (City of Culver City)
6. Sepulveda Boulevard and Center Drive (City of Los Angeles)
7. Park Terrace Drive and Center Drive (City of Los Angeles)
8. Sepulveda Boulevard and Howard Hughes Parkway (City of Los Angeles)
9. Sepulveda Boulevard and 76th Street (City of Los Angeles)
10. Centinela Avenue and Bristol Parkway (City of Culver City)
11. Park Terrace Drive and Howard Hughes Parkway (City of Los Angeles)
12. Sepulveda Boulevard and Jefferson Boulevard (City of Culver City)
13. Jefferson Boulevard and Slauson Avenue (City of Culver City)
14. Sepulveda Boulevard and Slauson Avenue (City of Culver City)
15. Jefferson Boulevard and I-405 Northbound Ramps (City of Culver City)



Source: The Mobility Group, September 20, 2017.

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Figure III-4
Locations and Configurations of Study Intersections

All study intersections are signalized. For those intersections located in City of Los Angeles, they currently operate under the City's ATSAC system (Automated Traffic Surveillance and Control) which is a centralized control system that provides for the coordination of traffic signal timing to maximize the street capacities and to minimize traffic delays on City streets, and also under the ATCS system (Adaptive Traffic Control System) which is an enhancement to the ATSAC system that allows traffic-adaptive signal control based on real-time traffic conditions. The intersections in the City of Culver City operate under that City's traffic signal coordination system (Arterial Intelligent Transportation System).

Existing Intersection Conditions

Existing Traffic Volumes

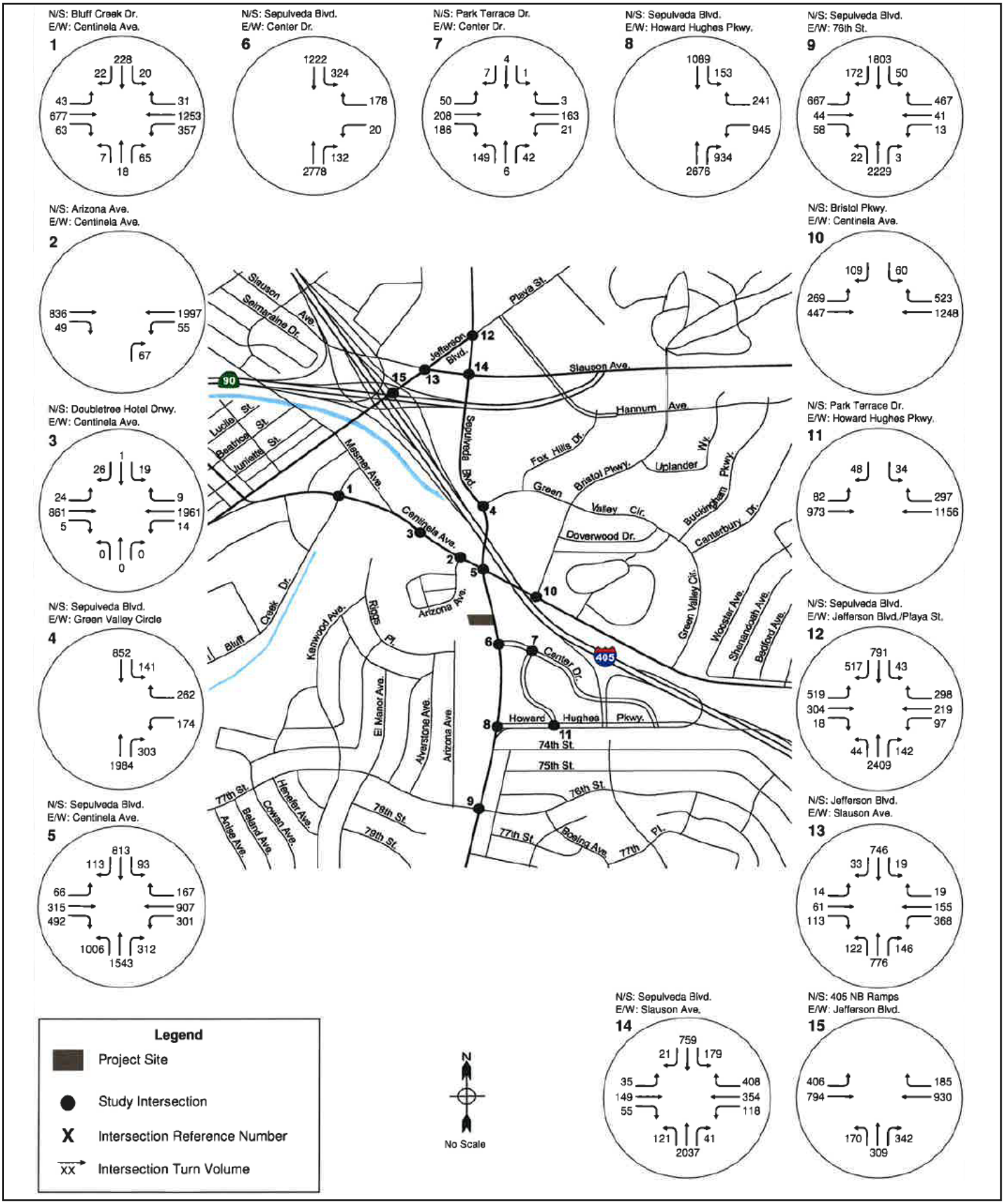
Recent traffic counts were used for all of the analyzed intersections. AM and PM peak period traffic counts (between 7:00 AM and 10:00 AM and between 3:00 PM and 6:00 PM) were conducted for all study intersections in April of 2017, except for four intersections where traffic counts were available for 2016 from the City of Culver City (which were factored by 1% to reflect 2017 conditions). The existing peak hour traffic volumes are illustrated in Figure III-5 and Figure III-6 for the AM and PM peak hours respectively (highest volume hours within the peak periods).

In the subsequent impact analysis, trip credits for the existing building use on the Project Site were included in the trip generation estimates. However, since the existing traffic counts were conducted after the use went out of business, those trips were added to the existing traffic counts in order to have the most conservative Level of Service (LOS) analysis of the base existing conditions.

Level of Service Methodology

Since the list of intersections identified for analysis contains intersections located within two different jurisdictions, the level of service analysis was conducted using the methodology and significance thresholds established by each of the jurisdictions. All intersections located within the cities of Los Angeles and Culver City were analyzed using the Critical Movement Analysis (CMA) methodology. The City of Los Angeles considers a 7% capacity increase for Automated Traffic Surveillance and Control (ATSAC) system and a 3% capacity increase for Adaptive Traffic Control System (ATCS). The City of Culver City, however, considers only a 7% capacity increase for its coordinated traffic signal system.

Level of service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. For the CMA analysis methodology, these levels of service are defined by a range of volume/capacity (V/C) ratios. Table 2.1 in the Traffic Study further defines the ranges of V/C ratios and delay and their corresponding levels of service for signalized intersections.



Source: The Mobility Group, September 20, 2017.

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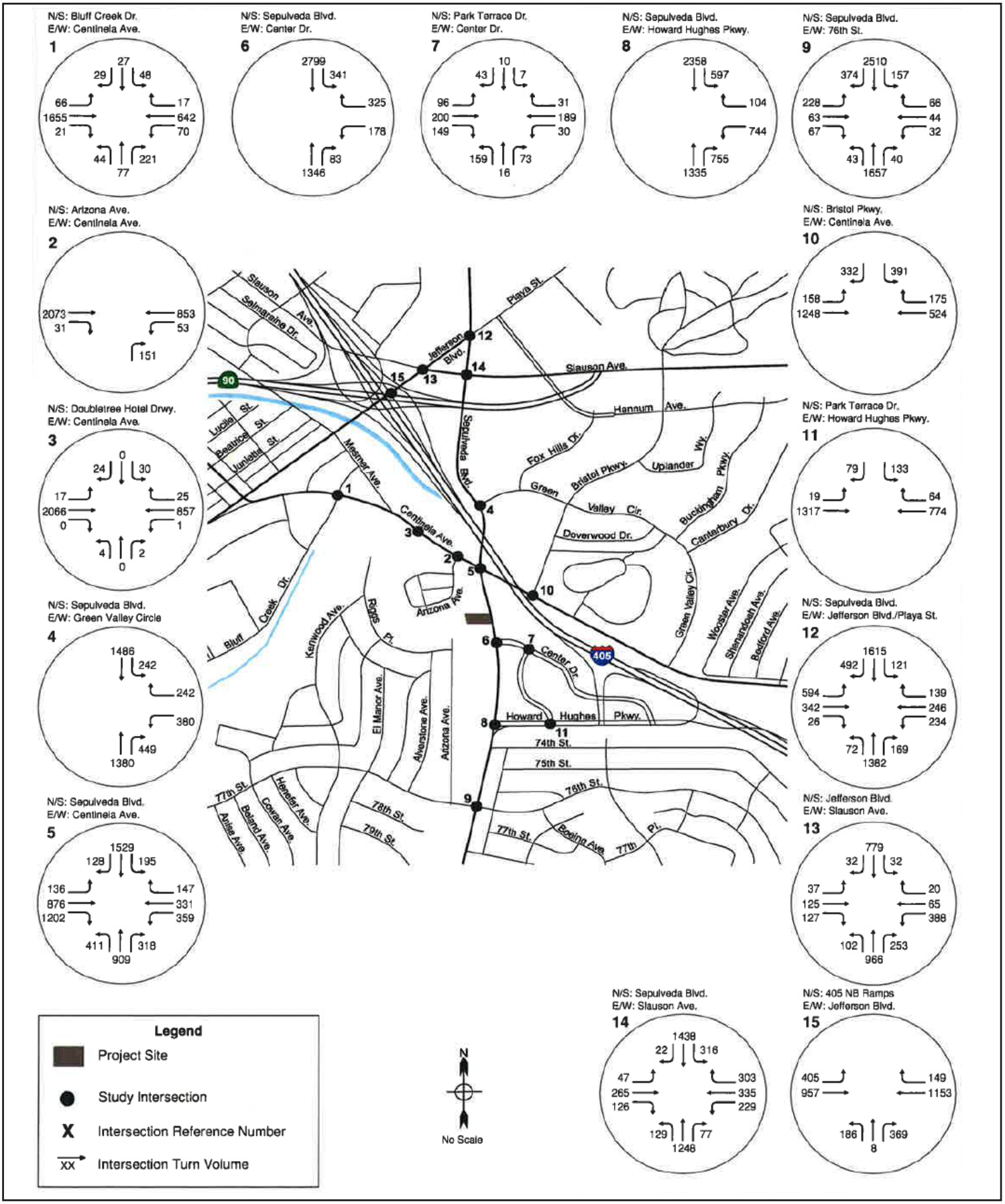
Figure III-5
Existing Traffic Volumes (2017) - AM Peak Hour



Source: The Mobility Group, September 20, 2017.

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Figure III-6
Existing Traffic Volumes (2017) - PM Peak Hour

Existing Peak Hour Levels of Service

Table III-26 summarizes the existing AM and PM peak hour V/C ratios and corresponding levels of service at the analyzed intersections.

AM Peak Hour

All of the studied intersections currently operate at LOS D or better during the AM peak hour except for the following three intersections.

#5. Sepulveda Boulevard & Centinela Avenue (City of Culver City) LOS E
#9. Sepulveda Boulevard & 76th Street (City of Los Angeles) LOS F
#12. Sepulveda Boulevard & Jefferson Boulevard (City of Culver City) LOS E

PM Peak Hour

All of the studied intersections currently operate at LOS D or better during the PM peak hour except for the following intersection.

#5. Sepulveda Boulevard & Centinela Avenue (City of Culver City) LOS E

Table III-26
Existing Traffic Conditions – Intersection Level of Service

No.	Intersection	Existing Conditions			
		AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
1	Bluff Creek & Centinela Avenue	0.323	A	0.383	A
2	Arizona Avenue & Centinela Avenue	0.604	B	0.381	A
3	Doubletree Hotel Driveway & Centinela Avenue	0.440	A	0.334	A
4	Sepulveda Boulevard & Green Valley Circle	0.550	A	0.491	A
5	Sepulveda Boulevard & Centinela Avenue	0.968	E	0.927	E
6	Sepulveda Boulevard and Center Drive	0.520	A	0.651	B
7	Park Terrace Drive & Center Drive	0.097	A	0.127	A
8	Sepulveda Boulevard & Howard Hughes Parkway	0.731	C	0.751	C
9	Sepulveda Boulevard & 76th Street	1.025	F	0.636	B
10	Bristol Parkway & Centinela Avenue	0.580	A	0.519	A
11	Park Terrace Drive & Howard Hughes Parkway	0.266	A	0.456	A
12	Sepulveda Boulevard & Jefferson Boulevard	0.988	E	0.721	C
13	Jefferson Boulevard & Slauson Avenue	0.399	A	0.446	A
14	Sepulveda Boulevard & Slauson Avenue	0.756	C	0.566	A
15	Jefferson Boulevard & 405 NB on-ramp	0.761	C	0.621	B

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Existing Transit Service

The Project Site is located in an area with bus service provided by a total of three local and inter-city transit operators. Within a quarter-mile radius of the Project Site, Metro (Los Angeles County Metropolitan Transportation Authority) operates two bus lines; LADOT operates one Commuter Express bus line; and Culver City operates three bus lines.

Metro Bus Service

Metro operates two local bus lines in the vicinity of the Project Site, both of which run on Sepulveda Boulevard and serve the Project Site. Route 110 runs between Playa Vista and Bell Gardens, and operates between approximately 5:15 AM to 10:20 PM eastbound and 5:40 AM to 11:40 PM westbound. It runs at about 15-30 minute headways in the eastbound direction and 12-20 minute headways in the westbound direction during weekday peak periods. Route 217 runs between Fox Hill and Hollywood, and operates between approximately 4:55 AM to 7:20 PM in the northbound direction and 5:50 AM to 7:30 PM in the southbound direction. It runs at about 30-minute headways in the northbound direction and 60-minute headways in the southbound direction during weekday peak periods.

LADOT - Commuter Express

LADOT operates the Commuter Express local bus system, of which one route (route 574) serves the Project area. This bus line operates every 30 minutes on the southbound direction during the AM peak period, with no buses operating on the northbound direction. Route 574 operates every 30 minutes on the northbound direction during the PM peak period, with no buses operating on the southbound direction.

Culver City Bus Service

The City of Culver City operates local and rapid bus lines. There are a total of three bus lines, including one rapid line and two local lines that serve the Project and provide access to various points in the city. Route 6 is a rapid line that operates every 15 minutes during the weekday AM and PM peak periods. Route 6 also has a local line that serves Sepulveda Boulevard. The other local line is Route 3. This route runs through Sepulveda Boulevard, Centinela Avenue, and Green Valley Circle. The local lines operate every 12-20 minutes during the weekday AM and PM peak periods.

Future Conditions Without the Project

Traffic Forecasts

In order to evaluate the potential traffic impacts of the Proposed Project, it was necessary to first estimate and then analyze future traffic conditions without the Proposed Project. The year selected for this analysis was 2020 which is the expected year of completion of the Proposed Project.

Future traffic forecasts were estimated by forecasting two separate components of traffic growth in the study area.

The first component represents the ambient growth that is a general growth in traffic volumes due to minor new developments in the Project Area, and regional growth and development outside the study area. A growth rate of 1% per year was assumed for this ambient traffic growth in conjunction with input from LADOT. The existing traffic counts were therefore adjusted upward by a total of 3% to represent the ambient growth for the Project completion year.

The second component of future growth relates to specific development projects located in the study area that are either under construction, approved, or under formal planning consideration and potentially could be in place by the year 2020 when the Proposed Project will be completed. The following section describes the process of estimating traffic from these related projects.

This approach is conservative in that not all of the related projects may be ultimately built, and not all may be built by 2020 (the buildout year of the Proposed Project). Along with the fact that the analysis includes both a list of specific related projects and a general background growth factor, the analysis likely overstates the future growth in traffic without the Proposed Project.

Related Projects

Project List

A list of proposed development projects that could affect traffic conditions in the Project Area was prepared based on information obtained from a variety of sources including the City of Los Angeles and the City of Culver City. Additional information was obtained from other studies and reports conducted in the area and through field verification and observations. A total of 21 potential development projects were identified within a radius of 1.5 miles from the Project Site, the locations of which are shown in Figure II-19 and are listed in Table II-6 in the Project Description.

It should also be noted that, for purposes of preparing a conservative worst-case analysis, no potential street improvements or transportation mitigation measures that might be associated with any of the related projects were included in the future conditions traffic analysis.

Project Trip Generation and Distribution

Trip generation estimates for the related projects were prepared. These were generally taken from the environmental and/or traffic studies prepared for the individual projects. Where the information was not available from previous reports, the trip generation was estimated using trip rates developed by the Institute of Transportation Engineers (ITE). Similarly, trip distribution estimates were also taken from previous studies where available or were estimated based on an understanding of the type of the project, its location, and the surrounding roadway and circulation system.

As shown in Table 3.1 of the Traffic Study, the related projects would generate a total of about 5,357 vehicle trips in the AM peak hour and about 5,579 vehicle trips in the PM peak hour. It should be noted that because of the geographic distribution of these projects, that not all of these trips would travel through all of the study area and traverse all of the study intersections.

Future Traffic Forecasts for 2020 Without Project Condition

The trip estimates shown in Table 3.1 of the Traffic Study were then added to the roadway network and combined with existing volumes and ambient traffic growth (described earlier) to provide forecasts of future traffic conditions in the study area in 2020, for both the AM and PM peak periods, representing the Future Without Project conditions.

The Future Without Project peak hour traffic volumes are illustrated in Figure III-7 and Figure III-8 for the AM and PM peak hours respectively.

Transportation System Improvement Projects

No roadway or transportation system improvements were assumed in the study area for the future condition analysis. This provides a conservative analysis as although there may be mitigation measures allocated with the related projects included in the analysis, those projects are currently not underway so the timing of implementation of mitigations is uncertain.

The exception is the driveway improvements for the planned project immediately south of the Proposed Project (at 6733 Sepulveda Boulevard). This project will implement a west leg to the intersection of Sepulveda Boulevard and Center Drive that will function as the main driveway for that project. Due to the proximity to the Proposed Project, the improvements to be implemented at the intersection of Sepulveda Boulevard and Center Drive (including modification of signal phasing) were included in the analysis.

Future Intersection Conditions

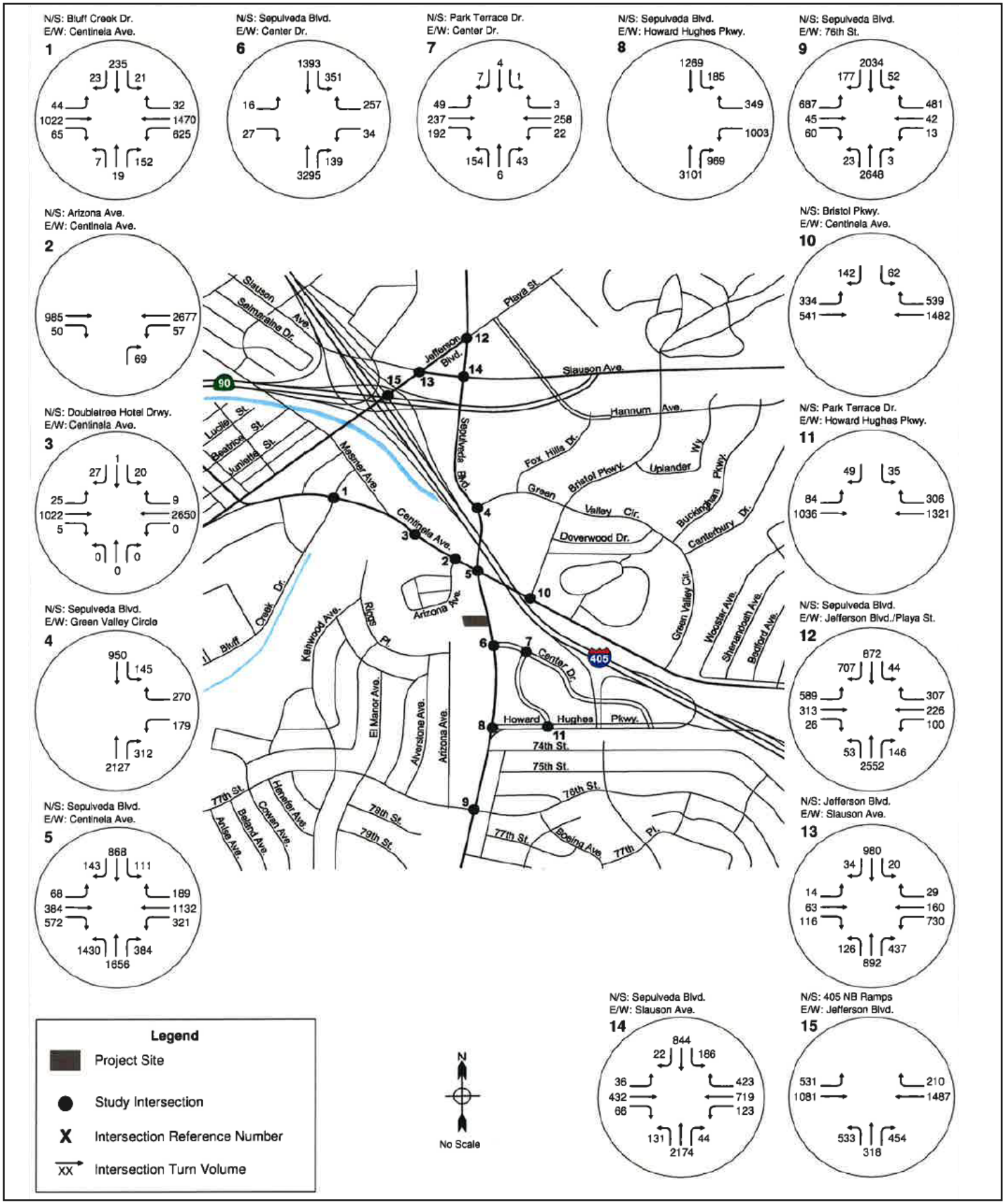
Future Without Project Intersection Level of Service

The Future Without Project traffic forecasts were evaluated to determine the V/C ratio and LOS for the analyzed intersections for both the AM peak hour and the PM peak hour. The results are shown in Table III-27 and Table III-28, which summarize the intersection levels of service calculated for the Future Without Project conditions, and compares them to existing conditions levels of service.

AM Peak Hour

All studied intersections would operate at LOS D or better during the AM peak hour, with the exception of the following four intersections.

#5.	Sepulveda Boulevard & Centinela Avenue (City of Culver City)	LOS F
#9.	Sepulveda Boulevard & 76th Street (City of Los Angeles)	LOS F
#12.	Sepulveda Boulevard & Jefferson Boulevard (City of Culver City)	LOS F
#15.	Jefferson Boulevard & I-405 NB Ramps (City of Culver City)	LOS F



Source: The Mobility Group, September 20, 2017.

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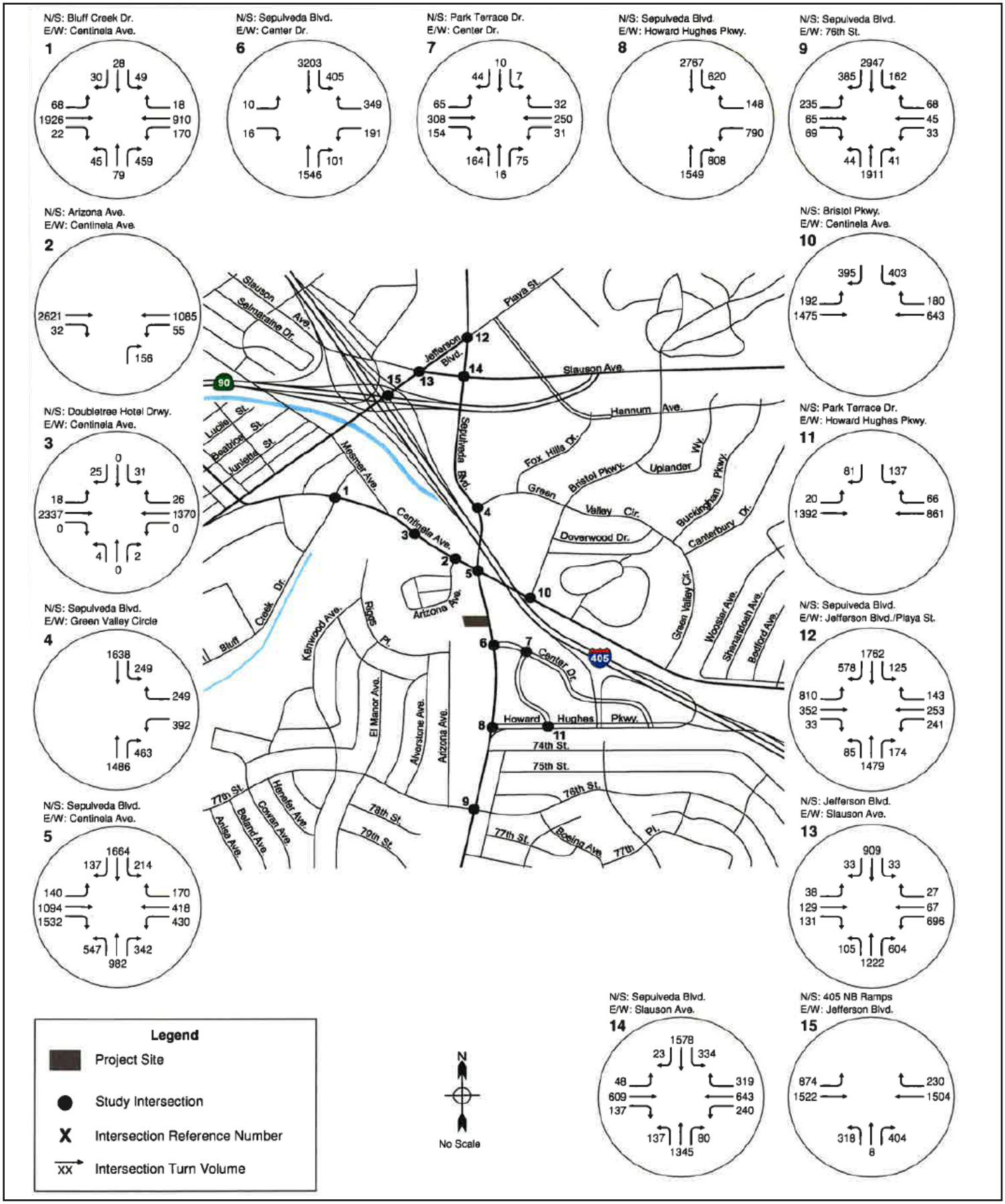
Figure III-7
Future Without Project Traffic Volumes (2020) - AM Peak Hour



Source: The Mobility Group, September 20, 2017.

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Figure III-8
Future Without Project Traffic Volumes (2020) - PM Peak Hour

PM Peak Hour

All studied intersections would operate at LOS D or better during the PM peak hour, with the exception of the following two intersections.

#5.	Sepulveda Boulevard & Centinela Avenue (City of Culver City)	LOS F
#15.	Jefferson Boulevard & I-405 NB Ramps (City of Culver City)	LOS E

Table III-27
Future Without Project Conditions – Intersection Level of Service, AM Peak Hour

No.	Intersection	Existing Conditions		Future Without Project Conditions	
		V/C	LOS	V/C	LOS
1	Bluff Creek & Centinela Avenue	0.323	A	0.428	A
2	Arizona Avenue & Centinela Avenue	0.604	B	0.831	D
3	Doubletree Hotel Driveway & Centinela Avenue	0.440	A	0.603	B
4	Sepulveda Boulevard & Green Valley Circle	0.550	A	0.589	A
5	Sepulveda Boulevard & Centinela Avenue	0.968	E	1.243	F
6	Sepulveda Boulevard and Center Drive	0.520	A	0.672	B
7	Park Terrace Drive & Center Drive	0.097	A	0.120	A
8	Sepulveda Boulevard & Howard Hughes Parkway	0.661	B	0.762	C
9	Sepulveda Boulevard & 76th Street	1.025	F	1.141	F
10	Bristol Parkway & Centinela Avenue	0.580	A	0.708	C
11	Park Terrace Drive & Howard Hughes Parkway	0.266	A	0.292	A
12	Sepulveda Boulevard & Jefferson Boulevard	0.988	E	1.059	F
13	Jefferson Boulevard & Slauson Avenue	0.399	A	0.606	B
14	Sepulveda Boulevard & Slauson Avenue	0.756	C	0.830	D
15	Jefferson Boulevard & 405 NB on-ramp	0.761	C	1.025	F

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Table III-28
Future Without Project Conditions – Intersection Level of Service, PM Peak Hour

No.	Intersection	Existing Conditions		Future Without Project Conditions	
		V/C	LOS	V/C	LOS
1	Bluff Creek & Centinela Avenue	0.383	A	0.598	A
2	Arizona Avenue & Centinela Avenue	0.381	A	0.476	A
3	Doubletree Hotel Driveway & Centinela Avenue	0.334	A	0.382	A
4	Sepulveda Boulevard & Green Valley Circle	0.491	A	0.524	A
5	Sepulveda Boulevard & Centinela Avenue	0.927	E	1.123	F
6	Sepulveda Boulevard and Center Drive	0.651	B	0.758	C
7	Park Terrace Drive & Center Drive	0.127	A	0.153	A
8	Sepulveda Boulevard & Howard Hughes Parkway	0.634	B	0.741	C
9	Sepulveda Boulevard & 76th Street	0.636	B	0.742	C
10	Bristol Parkway & Centinela Avenue	0.519	A	0.604	B
11	Park Terrace Drive & Howard Hughes Parkway	0.456	A	0.485	A
12	Sepulveda Boulevard & Jefferson Boulevard	0.721	C	0.838	D
13	Jefferson Boulevard & Slauson Avenue	0.446	A	0.627	B
14	Sepulveda Boulevard & Slauson Avenue	0.566	A	0.727	C
15	Jefferson Boulevard & 405 NB on-ramp	0.621	B	0.908	E

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Future With Project Conditions

Project Transportation Characteristics

The Proposed Project is located at 6711 Sepulveda Boulevard in the City of Los Angeles. The Project Site is generally bounded by Sepulveda Boulevard to the east, and private properties to the north, south, and west. Access to the Project Site is via Sepulveda Boulevard. The Project Site contains a former storage facility that occupied the Project Site from late 2002 until January 31, 2017. The Proposed Project would comprise approximately 180 residential units including 165 apartment units and 15 affordable housing units, with no commercial uses. In discussion with LADOT, it was confirmed that the driveway of the proposed development would be a Right-In/Right-Out (RIRO) driveway.

Project Trip Generation

Trip generation for the Proposed Project was estimated using trip rates from three difference sources, including the Trip Generation Manual - 9th Edition (Institute of Transportation Engineers, 2012), LADOT trip rates for affordable family units, and the Coastal Transportation Corridor Specific Plan for PM peak hour total number of trips for certain land uses. Table III-29, III-30, and III-31 summarizes the trip generation estimates for the daily, AM peak, and PM peak hour periods respectively.

Table III-29
Project Trip Generation Estimates – Daily Trips

Land Use Assumptions	Source & Code [a]	Size	Daily			
				Trip Rate		Total Trips
Existing Uses						
Mini-Warehouse [a]	ITE 151	37,850 sf		2.50		-95
Net Mini-Warehouse						*-95*
Total Existing Daily Trips						***-95***
Proposed Uses						
Apartments [a, b]	ITE 220	165 du		6.65		1,097
(Adjustment for transit/walk) – 15%						-165
Net Market-Rate Apartments						*932*
Affordable Apartments [e]	LADOT	15 du		4.08		61
Net Affordable Apartments						*61*
Proposed Project Daily Trips						***993***
Net Project Daily Trips						***898***

Notes:
Some numbers may not add up perfectly due to rounding.
[a] *ITE Trip Rates from Trip Generation Manual, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012, except otherwise noted.*
[b] *Source: Trip rates for ITE 220 – Apartments*
[c] *PM peak hour trip generation rates per Coastal Transportation Corridor Specific Plan for Storage use*
[d] *PM peak hour inbound/outbound percentages per ITE's Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012*
[e] *Source: LADOT 2016 – Transportation Impact Study Guidelines.*
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

The Project Site is located within the jurisdiction of the Coastal Transportation Corridor Specific Plan ("CTCSP", City of Los Angeles Ordinance Number 168,999), which identifies traffic management and analysis strategies that are specifically tailored for the coastal portions of the City of Los Angeles generally bounded by the City of Santa Monica on the north, the City of El Segundo on the south, the San Diego (1-405) Freeway on the east, and the Pacific Ocean on the west. Per the CTCSP, trip generation rates from the CTCSP were used where available.

Trips were adjusted for potential use of transit and walk. The Proposed Project is close to transit and located in a high density area of Los Angeles. The Project Area is currently served by a total of three local and inter-city transit operators. Within a quarter-mile radius of the Project Site, the City of Culver City operates Rapid Line 6 which provides both northbound and southbound stops along Sepulveda Boulevard, Metro (Los Angeles County Metropolitan Transportation Authority) operates two bus lines, and LADOT operates a Commuter Express bus line in this area. Per LADOT guidelines, trips for all uses were therefore reduced by 15% to allow for transit and walk trips.

Table III-30
Project Trip Generation Estimates – AM Peak Hour Trips

Land Use Assumptions	Source & Code [a]	Size	Trip Rate			Total Trips		
			In	Out	Total	In	Out	Total
Existing Uses								
Mini-Warehouse [a]	ITE 151	37,850 sf	55%	45%	0.14	-3	-2	-5
Total Existing AM Peak Hour Trips						***-3***	***-2***	***-5***
Proposed Uses								
Apartments [a, b]	ITE 220	165 du	20%	80%	0.51	17	67	84
(Adjustment for transit/walk) – 15%						*-3*	*-10*	*-13*
Net Market-Rate Apartments						*14*	*57*	*71*
Affordable Apartments [e]	LADOT	15 du	40%	60%	0.50	3	5	8
Net Affordable Apartments						*3*	*5*	*8*
Proposed Project AM Peak Hour Trips						***17***	***62***	***79***
Net Project AM Peak Hour Trips						***14***	***60***	***74***

Some numbers may not add up perfectly due to rounding.
[a] *ITE Trip Rates from Trip Generation Manual, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012, except otherwise noted.*
[b] *Source: Trip rates for ITE 220 – Apartments*
[c] *PM peak hour trip generation rates per Coastal Transportation Corridor Specific Plan for Storage use*
[d] *PM peak hour inbound/outbound percentages per ITE's Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012*
[e] *Source: LADOT 2016 – Transportation Impact Study Guidelines.*
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Table III-31
Project Trip Generation Estimates – PM Peak Hour Trips

Land Use Assumptions	Source & Code [c]	Size	Trip Rate			Total Trips		
			In [d]	Out [d]	Total	In	Out	Total
Existing Uses								
Mini-Warehouse [a]	CTCSP	37,850 sf	50%	50%	0.3 [c]	-6	-5	-11
Total Existing PM Peak Hour Trips						***-6***	***-5***	***-11***
Proposed Uses								
Apartments [a, b]	CTCSP	165 du	65%	35%	0.70	75	40	115
(Adjustment for transit/walk) – 15%						*-11*	*-6*	*-17*
Net Market-Rate Apartments						*64*	*34*	*98*
Affordable Apartments [e]	LADOT	15 du	55%	45%	0.34	3	2	5
Net Affordable Apartments						*3*	*2*	*5*
Proposed Project PM Peak Hour Trips						***67***	***36***	***103***
Net Project PM Peak Hour Trips						***61***	***31***	***92***

Some numbers may not add up perfectly due to rounding.
[a] *ITE Trip Rates from Trip Generation Manual, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012, except otherwise noted.*
[b] *Source: Trip rates for ITE 220 – Apartments*
[c] *PM peak hour trip generation rates per Coastal Transportation Corridor Specific Plan for Storage use*
[d] *PM peak hour inbound/outbound percentages per ITE's Trip Generation, 9th Edition, Institute of Transportation Engineers, Washington, DC, 2012*
[e] *Source: LADOT 2016 – Transportation Impact Study Guidelines.*
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

In calculating the number of vehicle trips, a trip credit may be taken for the existing building uses on the Project Site. The Coastal Transportation Corridor Specific Plan (CTCSP), Section 5 C, Page 8, states:

> "The Department of Transportation shall grant a 100 percent Trip credit to a Project from the Trips generated by the existing use, if the existing use has been in place for at least one year continuously during the four years immediately preceding the application for a building permit. A 50 percent Trip credit from the Trips generated by the existing use shall be allowed if the use has been in place for at least 6 months continuously during the same four year period."

Based on the above statement, trip credits for the existing building use on the Project Site were included in the following trip generation estimates. However, since the existing traffic counts were conducted after the storage facility went out of business, those trips will also be added to the existing traffic counts in order to have the most conservative Level of Service (LOS) analysis of the base existing conditions.

As shown in Table III-29, Table III-30, and Table III-31, the analysis estimates that the Proposed Project would generate a net total of 898 daily vehicle trips, 74 AM peak hour vehicle trips, and 92 PM peak hour vehicle trips.

These numbers reflect a credit for the existing self storage building because (a) it represents the historical use of the Project Site, (b) it could be reoccupied at any time without requiring any discretionary approvals, (c) LADOT's Traffic Study Policies and Procedures (June 2013) stipulate that when estimating a project's net new trips, it is appropriate to take trip credits for an existing use if the existing use was active for at least six months during the past two years and the self storage building meets this criteria, and (d) the Coastal Corridor Transportation Specific Plan, as ordinance adopted by the City Council that applies to the Project Site, LADOT shall grant a credit for each trip generated by an existing use if the existing use has been in place and operating for at least one year continuously during the four years immediately preceding the application for a project.

Trip Distribution

The distribution of Project trips was identified based on the type of land uses in the Proposed Project, the likely origins and destinations of Project residents and visitors, and the characteristics of the street system in the area of the Proposed Project. Based on these parameters, the following distribution was assumed:

- 33% of the trips towards the north
- 30% of the trips towards the south
- 20% of the trips towards the east
- 17% of the trips towards the west

Traffic generated by the Proposed Project was added to the Future Without Project traffic volumes to obtain future traffic volumes with the Proposed Project for both peak periods at each of the study intersections. The Project Only peak hour traffic volumes are illustrated in Figure III-9 and Figure III-10 for the AM and PM peak hours respectively and the total Future With Project conditions peak hour traffic volumes are illustrated in Figure III-11 and Figure III-12 for the AM and PM peak hours, respectively.

Project Impacts

Significant Impact Thresholds

The cities of Los Angeles sand Culver City have different significant impact thresholds as shown in Table III-32 below:

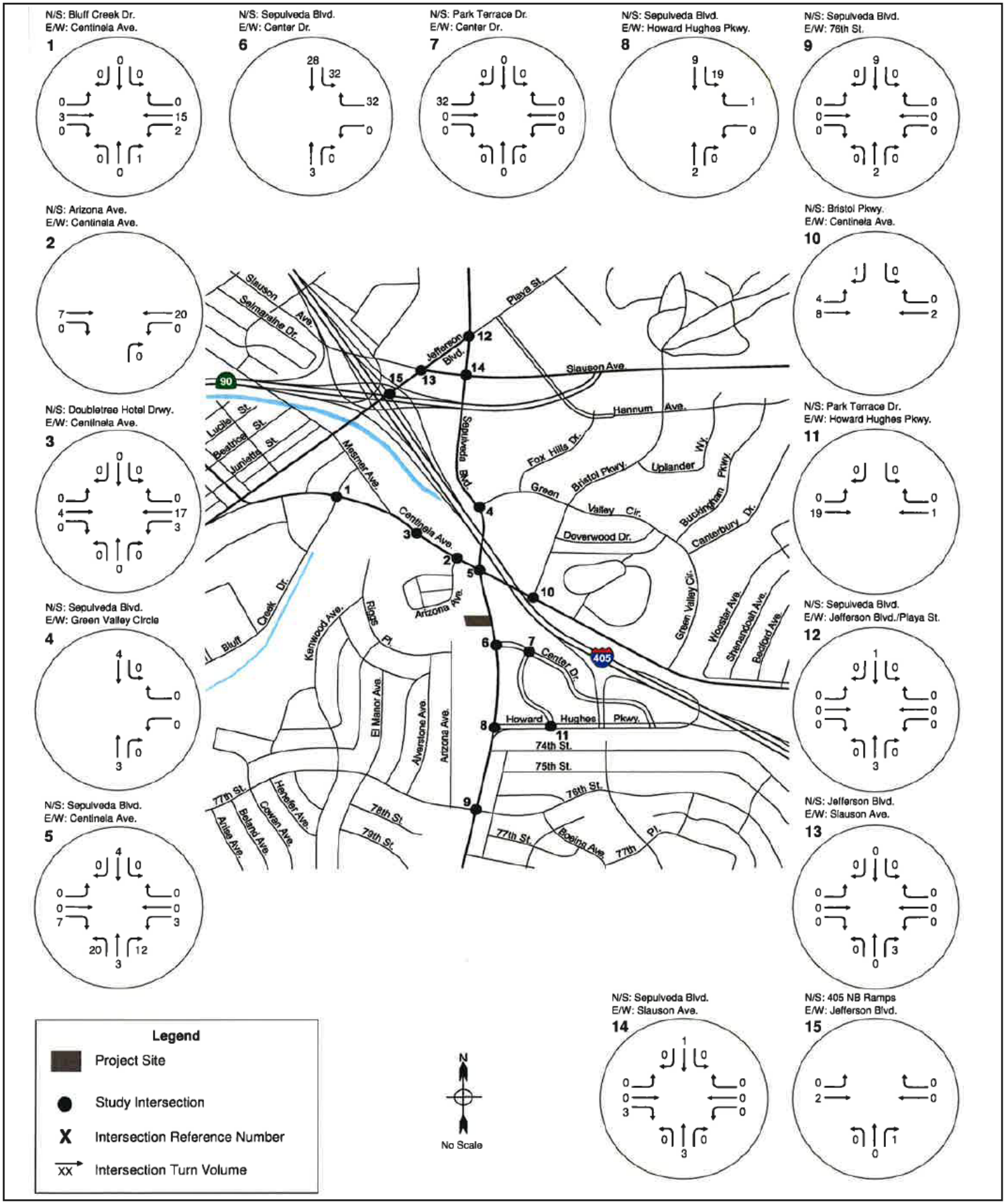
Table III-32
Intersection Impact Significance Criteria (LADOT and Culver City)

Level of Service (LOS)	Final (With Project) CMA Value	Project-Related Increase in Intersection CMA Value	
		LADOT	Culver City
A or B	≥ 0.700	No Impacts	No Impacts
C	> 0.700 – 0.800	≥ 0.040	≥ 0.050
D	> 0.800 – 0.900	≥ 0.020	≥ 0.040
E or F	> 0.900	≥ 0.010	≥ 0.020

The intersections that are located in the City of Los Angeles will be analyzed using LADOT intersection impact significance criteria. Even though the Cities of Los Angeles and Culver City have different intersection impact significance criteria, since the Proposed Project is located in the City of Los Angeles, all the intersections in Culver City would also be analyzed using LADOT intersection impact significance criteria per City of Culver City guidelines.

Project Impact Analysis - Future With Project Intersection Level of Service

The intersection level of service analysis for the Future With Project conditions is summarized in Table III-33 for the AM peak hour and in Table III-34 for the PM peak hour. These tables also compare the level of service for without Project and with Project conditions, show the increase in V/C ratios at each intersection due to the Proposed Project, and identify if the increase constitutes a significant impact.



Source: The Mobility Group, September 20, 2017.

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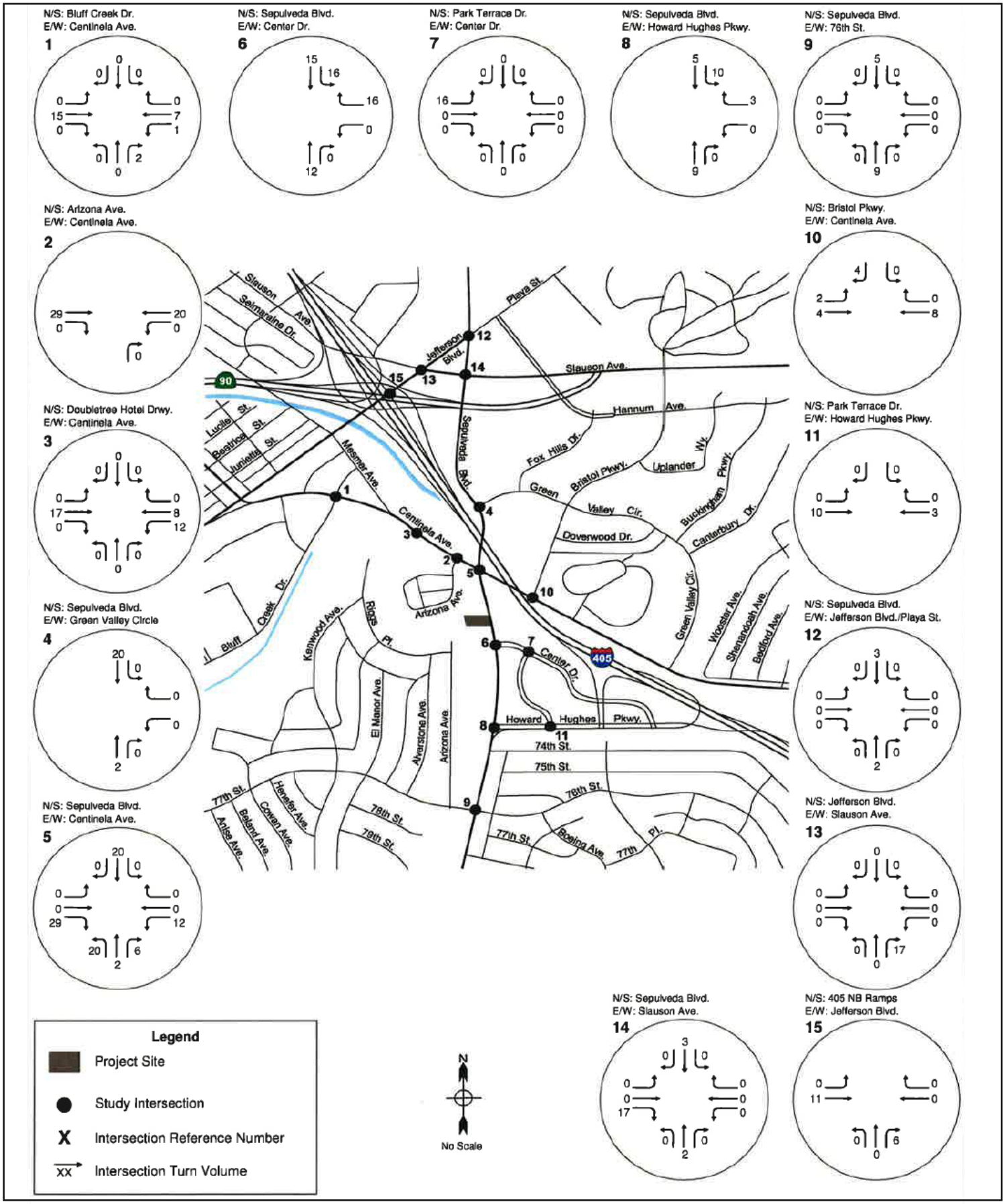
Figure III-9
Project Only Traffic Volumes - AM Peak Hour



Source: The Mobility Group, September 20, 2017.

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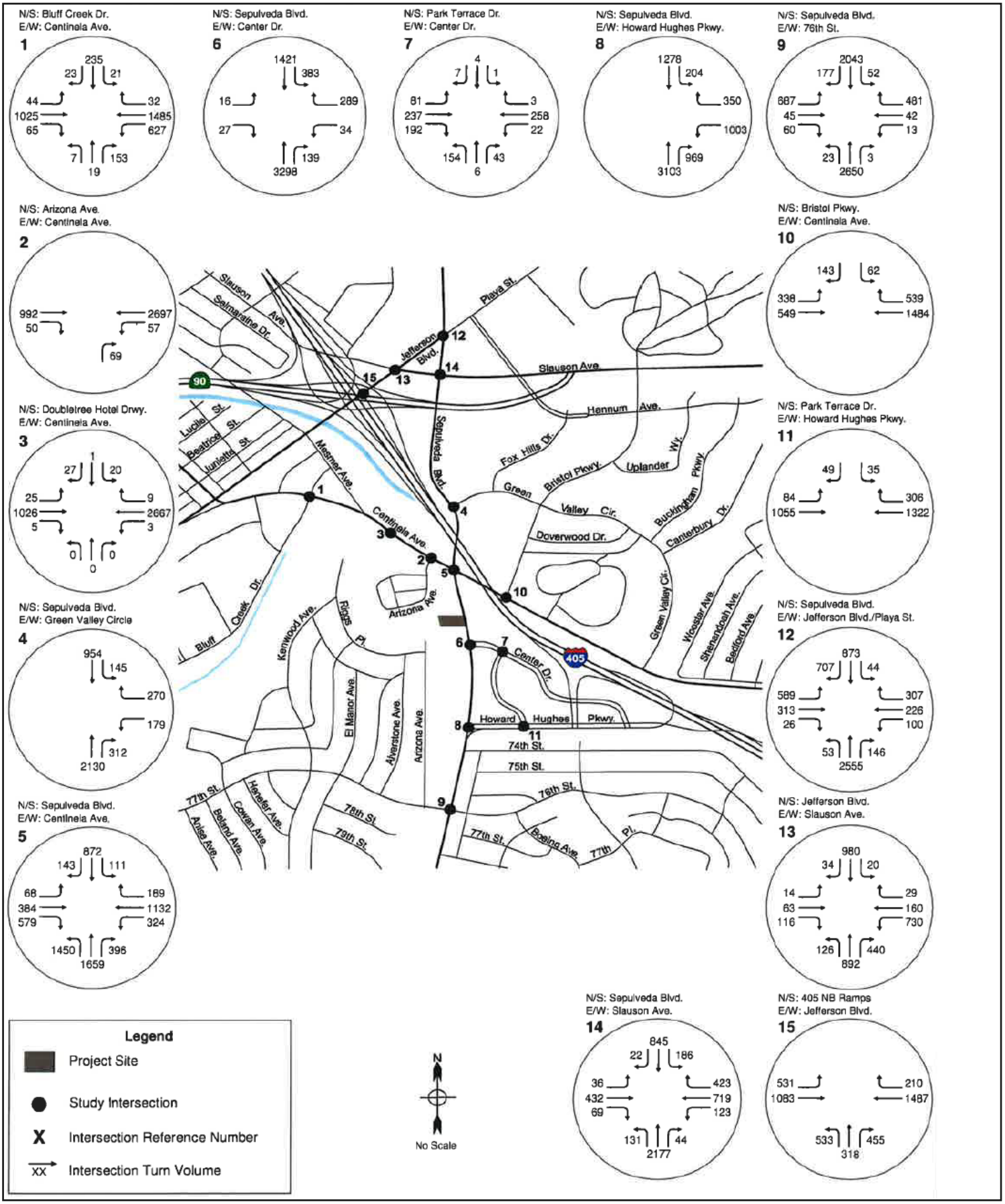
Figure III-10
Project Only Traffic Volumes - PM Peak Hour



Source: The Mobility Group, September 20, 2017.

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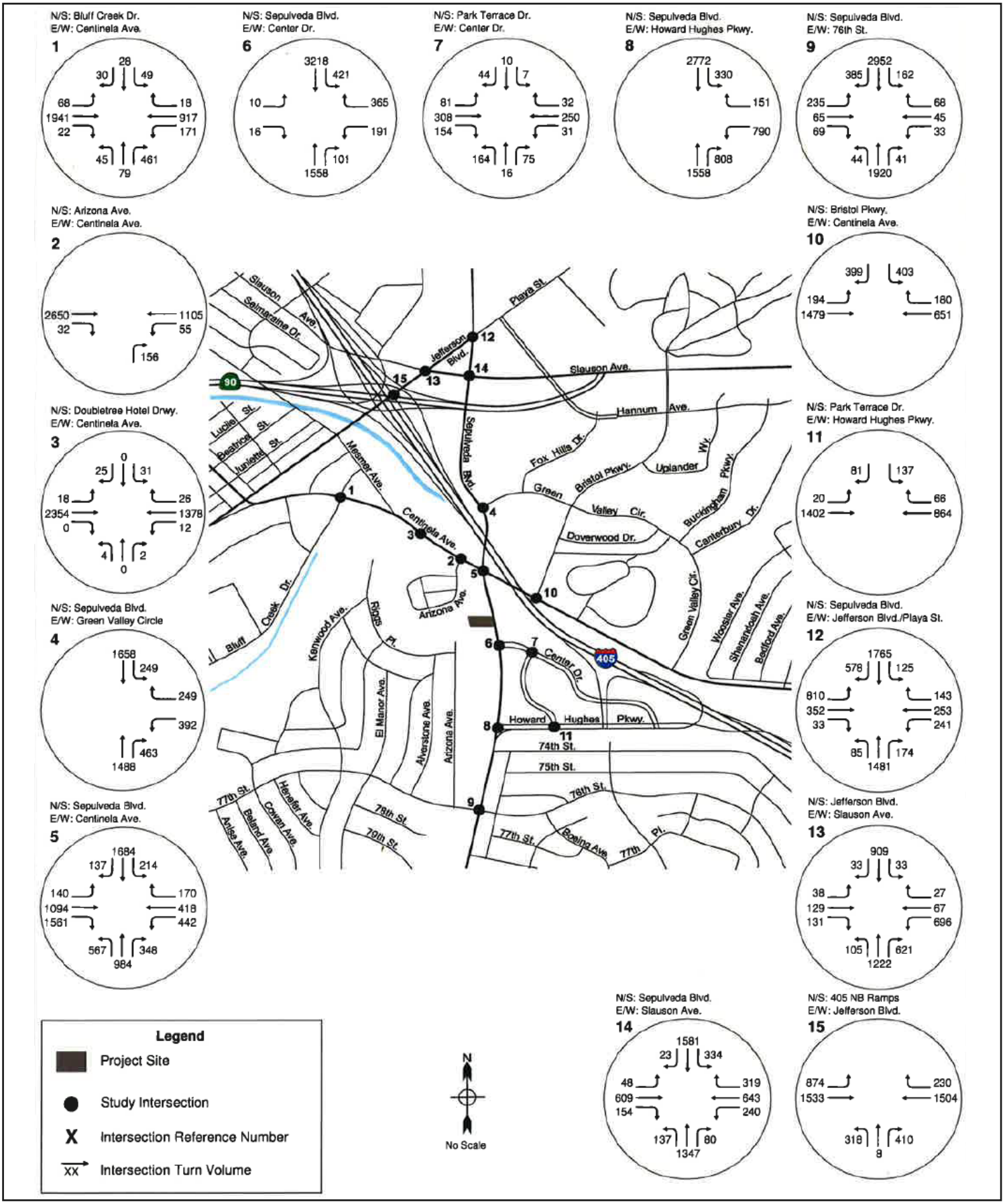
Figure III-11
Future with Project Traffic Volumes (2020) - AM Peak Hour



Source: The Mobility Group, September 20, 2017.

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Figure III-12
Future with Project Traffic Volumes (2020) - PM Peak Hour

Table III-33
Future with Project Conditions – Intersection Level of Service, AM Peak Hour

No.	Intersection	Future w/o Project		Future With Project		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS		
1	Bluff Creek & Centinela Avenue	0.428	A	0.429	A	0.001	No
2	Arizona Avenue & Centinela Avenue	0.831	D	0.837	D	0.006	No
3	Doubletree Hotel Driveway & Centinela Avenue	0.603	B	0.607	B	0.004	No
4	Sepulveda Boulevard & Green Valley Circle	0.589	A	0.590	A	0.001	No
5	Sepulveda Boulevard & Centinela Avenue	1.243	F	1.252	F	0.009	No
6	Sepulveda Boulevard and Center Drive	0.672	B	0.685	B	0.013	No
7	Park Terrace Drive & Center Drive	0.120	A	0.132	A	0.012	No
8	Sepulveda Boulevard & Howard Hughes Parkway	0.775	C	0.782	C	0.007	No
9	Sepulveda Boulevard & 76th Street	1.141	F	1.141	F	0.000	No
10	Bristol Parkway & Centinela Avenue	0.708	C	0.712	C	0.004	No
11	Park Terrace Drive & Howard Hughes Parkway	0.292	A	0.295	A	0.003	No
12	Sepulveda Boulevard & Jefferson Boulevard	1.059	F	1.059	F	0.000	No
13	Jefferson Boulevard & Slauson Avenue	0.606	B	0.606	B	0.000	No
14	Sepulveda Boulevard & Slauson Avenue	0.830	D	0.830	D	0.000	No
15	Jefferson Boulevard & 405 NB on-ramp	1.025	F	1.025	F	0.000	No

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Table III-34
Future with Project Conditions – Intersection Level of Service, PM Peak Hour

No.	Intersection	Future w/o Project		Future With Project		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS		
1	Bluff Creek & Centinela Avenue	0.598	A	0.602	B	0.004	No
2	Arizona Avenue & Centinela Avenue	0.476	A	0.481	A	0.005	No
3	Doubletree Hotel Driveway & Centinela Avenue	0.382	A	0.394	A	0.012	No
4	Sepulveda Boulevard & Green Valley Circle	0.524	A	0.524	A	0.000	No
5	Sepulveda Boulevard & Centinela Avenue	1.123	F	1.139	F	0.016	Yes
6	Sepulveda Boulevard and Center Drive	0.758	C	0.762	C	0.004	No
7	Park Terrace Drive & Center Drive	0.153	A	0.153	A	0.000	No
8	Sepulveda Boulevard & Howard Hughes Parkway	0.804	D	0.808	D	0.004	No
9	Sepulveda Boulevard & 76th Street	0.742	C	0.744	C	0.002	No
10	Bristol Parkway & Centinela Avenue	0.604	B	0.605	B	0.001	No
11	Park Terrace Drive & Howard Hughes Parkway	0.485	A	0.488	A	0.003	No
12	Sepulveda Boulevard & Jefferson Boulevard	0.838	D	0.839	D	0.001	No
13	Jefferson Boulevard & Slauson Avenue	0.627	B	0.639	B	0.012	No
14	Sepulveda Boulevard & Slauson Avenue	0.727	C	0.728	C	0.001	No
15	Jefferson Boulevard & 405 NB on-ramp	0.908	E	0.912	E	0.004	No

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

The analysis summarized in Table III-35 indicates that for the AM peak hour, the addition of Project traffic would not cause the level of service to change at any study intersection, and any increases in volume/capacity (V/C) ratios or average delay would be less than the threshold for a significant impact to occur.

The analysis summarized in Table III-36 indicates that for the PM peak hour, the addition of Proposed Project traffic would similarly not cause the level of service to change at any study intersection except of one study intersection (Bluff Creek Drive & Centinela Avenue, where it would change from LOS A to LOS B). Table III-36 also shows that any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur, except at one study intersection (Sepulveda Boulevard & Centinela Avenue).

It is therefore concluded that the Proposed Project would cause one significant traffic impact at one study intersection in the PM peak hour.

Existing With Project Impacts

This section addresses an analysis of potential Project impacts for the existing conditions with Project scenario. Project traffic was added to existing conditions traffic and the potential for impacts evaluated.

Existing With Project Intersection Level of Service

The total Existing With Project conditions peak hour traffic volumes are illustrated in Figure III-13 and III-14 for the AM and PM peak hours.

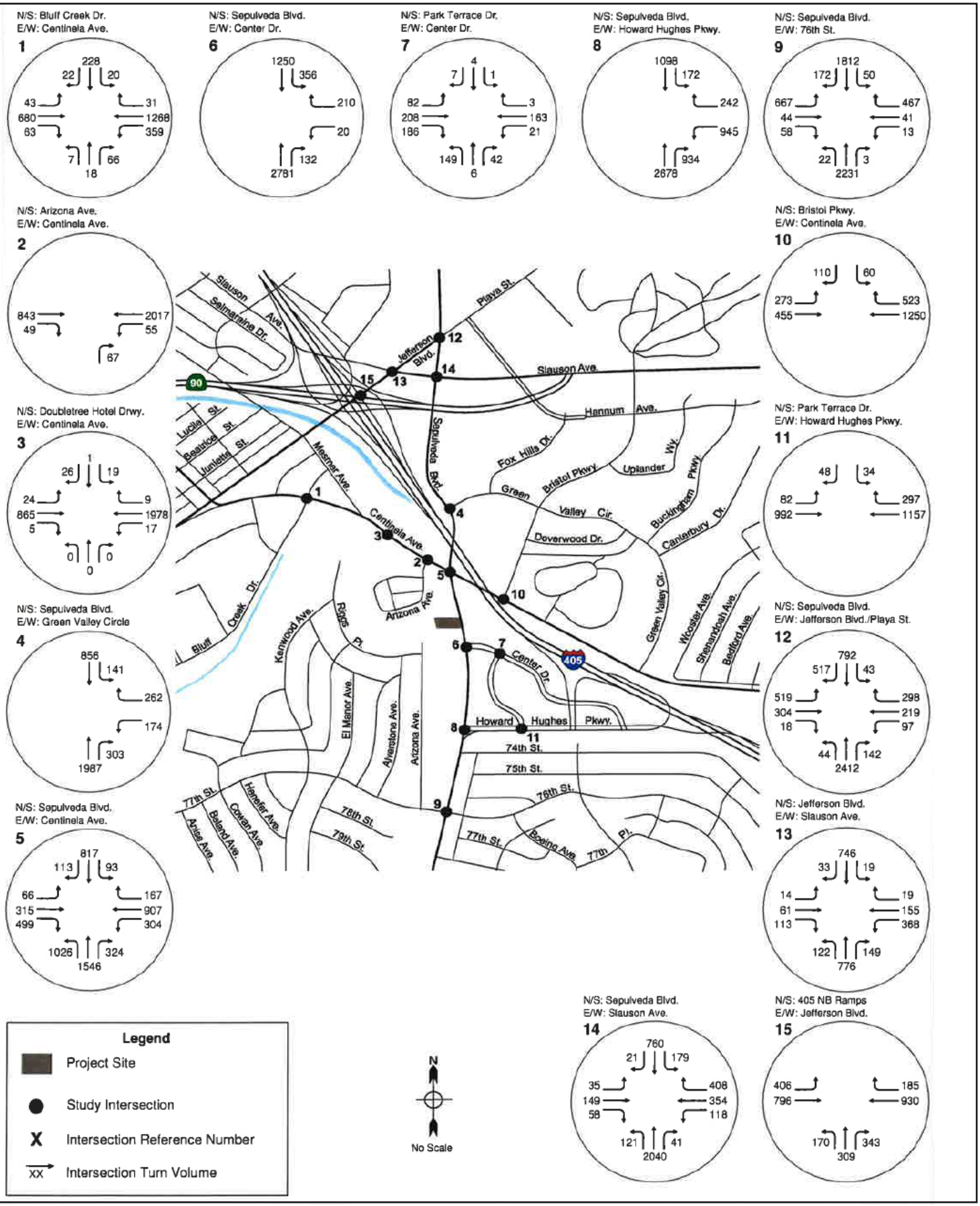
Table III-35 and Table III-36 summarize the level of service for the existing with Project conditions at the analyzed intersections for the AM and PM peak hours respectively.

Project Impacts

The analysis summarized in Table III-35 indicates that for the AM peak hour, the addition of Project traffic would not cause the level of service to change at any of the study intersections, and that any increases in volume/capacity (V/C) ratios or average delay would be less than the threshold for a significant impact to occur.

The analysis summarized in Table III-36 indicates that for the PM peak hour, the addition of Project traffic would similarly not cause the level of service to change at any study intersection. Table III-36 also shows that and that any increases in volume/capacity (V/C) ratios or average delay would be less than the threshold for a significant impact to occur except for one study intersection (Sepulveda Boulevard and Centinela Avenue).

It is therefore concluded that the Proposed Project would cause one significant traffic impact at one study intersection in the PM peak hour.



Source: The Mobility Group, September 20, 2017.

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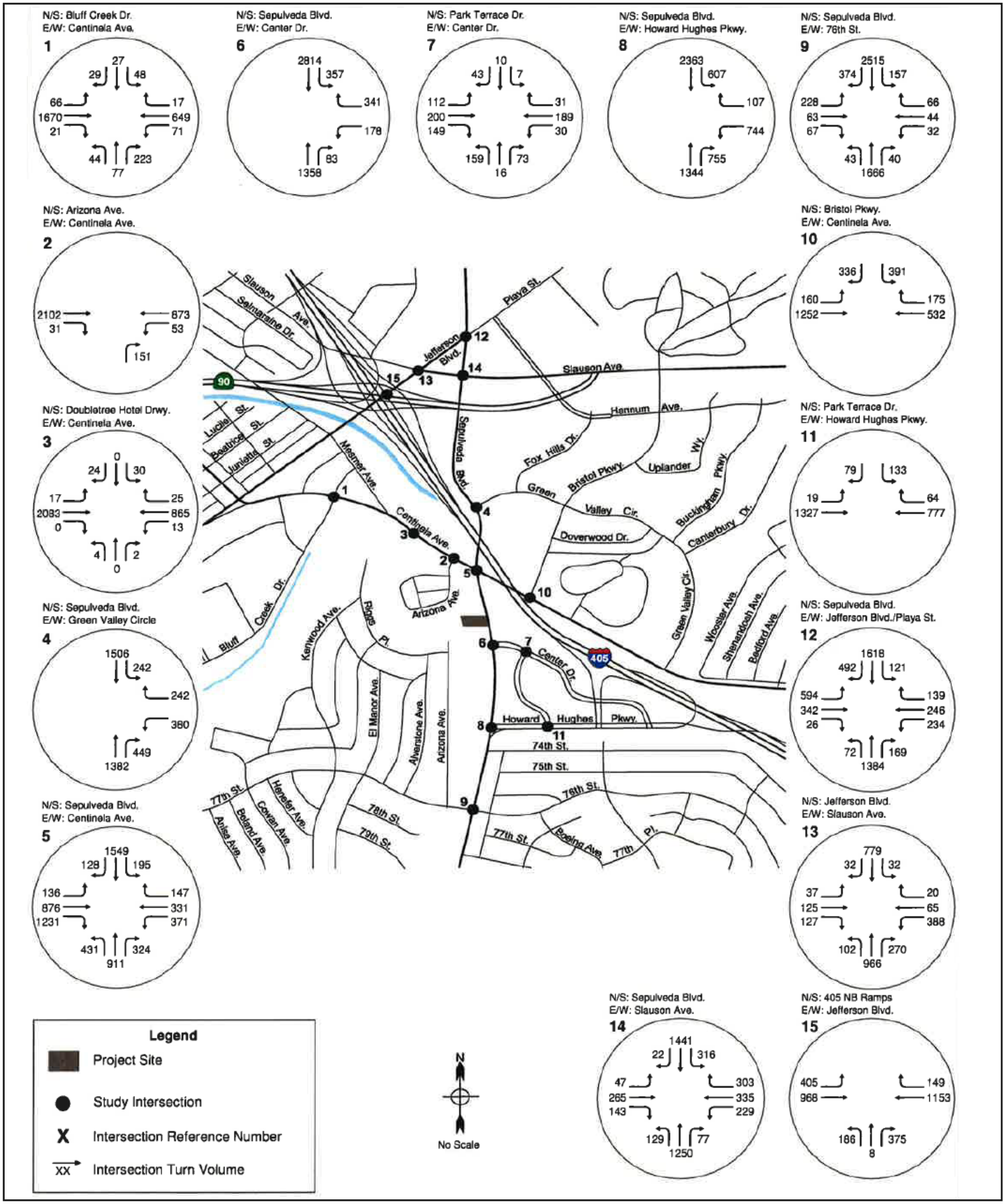
Figure III-13
Existing with Project Traffic Volumes (2017) - AM Peak Hour



Source: The Mobility Group, September 20, 2017.

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Figure III-14
Existing with Project Traffic Volumes (2017) - PM Peak Hour

Table III-35
Existing with Project Conditions – Intersection Level of Service, AM Peak Hour

No.	Intersection	AM Peak Hour				Change in V/C	Significant Impact
		Existing Conditions		Existing with Project			
		V/C	LOS	V/C	LOS		
1	Bluff Creek & Centinela Avenue	0.323	A	0.327	A	0.004	No
2	Arizona Avenue & Centinela Avenue	0.604	B	0.611	B	0.007	No
3	Doubletree Hotel Driveway & Centinela Avenue	0.440	A	0.444	A	0.004	No
4	Sepulveda Boulevard & Green Valley Circle	0.550	A	0.551	A	0.001	No
5	Sepulveda Boulevard & Centinela Avenue	0.968	E	0.977	E	0.009	No
6	Sepulveda Boulevard and Center Drive	0.520	A	0.535	A	0.015	No
7	Park Terrace Drive & Center Drive	0.097	A	0.098	A	0.001	No
8	Sepulveda Boulevard & Howard Hughes Parkway	0.731	C	0.738	C	0.007	No
9	Sepulveda Boulevard & 76th Street	1.025	F	1.026	F	0.001	No
10	Bristol Parkway & Centinela Avenue	0.580	A	0.583	A	0.003	No
11	Park Terrace Drive & Howard Hughes Parkway	0.266	A	0.272	A	0.006	No
12	Sepulveda Boulevard & Jefferson Boulevard	0.988	E	0.989	E	0.001	No
13	Jefferson Boulevard & Slauson Avenue	0.399	A	0.399	A	0.000	No
14	Sepulveda Boulevard & Slauson Avenue	0.756	C	0.757	C	0.001	No
15	Jefferson Boulevard & 405 NB on-ramp	0.761	C	0.762	C	0.001	No

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Table III-36
Existing with Project Conditions – Intersection Level of Service, PM Peak Hour

No.	Intersection	PM Peak Hour				Change in V/C	Significant Impact
		Existing Conditions		Existing with Project			
		V/C	LOS	V/C	LOS		
1	Bluff Creek & Centinela Avenue	0.383	A	0.387	A	0.004	No
2	Arizona Avenue & Centinela Avenue	0.381	A	0.386	A	0.005	No
3	Doubletree Hotel Driveway & Centinela Avenue	0.334	A	0.345	A	0.011	No
4	Sepulveda Boulevard & Green Valley Circle	0.491	A	0.492	A	0.001	No
5	Sepulveda Boulevard & Centinela Avenue	0.927	E	0.946	E	0.019	Yes
6	Sepulveda Boulevard and Center Drive	0.651	B	0.660	B	0.009	No
7	Park Terrace Drive & Center Drive	0.127	A	0.130	A	0.003	No
8	Sepulveda Boulevard & Howard Hughes Parkway	0.751	C	0.755	C	0.004	No
9	Sepulveda Boulevard & 76th Street	0.636	B	1.637	B	0.001	No
10	Bristol Parkway & Centinela Avenue	0.519	A	0.520	A	0.001	No
11	Park Terrace Drive & Howard Hughes Parkway	0.456	A	0.459	A	0.003	No
12	Sepulveda Boulevard & Jefferson Boulevard	0.721	C	0.722	C	0.001	No
13	Jefferson Boulevard & Slauson Avenue	0.446	A	0.446	A	0.000	No
14	Sepulveda Boulevard & Slauson Avenue	0.566	A	0.566	A	0.000	No
15	Jefferson Boulevard & 405 NB on-ramp	0.621	B	0.625	B	0.004	No

Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.

Review of Potential Mitigation

A review of potential physical mitigations (e.g. lane reconfigurations) was conducted for the intersection of Sepulveda Boulevard and Centinela Avenue, but no feasible mitigation measures were found. However, the City of Culver City continuously upgrades its traffic signals in its comprehensive Arterial Intelligent Transportation System (ITS). These improvements typically include CCTV cameras, detection equipment signal controller upgrades and interconnect upgrades. In coordination with the City of Culver City staff, it has been agreed that the Proposed Project would make a one-time financial contribution of $50,000 to the City of Culver City towards improvements to its Automated Intelligent Transportation System. Refer to Mitigation Measure T-1, below.

Mitigation Analysis

The City of Culver City has determined that this contribution would help achieve maximum efficiency of the transportation system in the area and that a V/C ratio credit of 0.01 can be applied to the impacted intersection with this improvement measure. This improvement measure would therefore reduce the impact at the intersection of Sepulveda Boulevard and Centinela Avenue to a less than significant level in both the Existing With Project and Future With Project Conditions as shown in Table III-37 and Table III-38. Therefore, with implementation of Mitigation Measure T-1, impacts to surrounding intersections would be reduced to less than significant.

Table III-37
Future with Project with Mitigation Conditions – Intersection Level of Service, PM Peak Hour

No.	Intersection	Future w/o Project		Future with Project		Change in V/C	Significant Impact	Future with Project with Mitigation		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS		
5	Sepulveda Blvd. & Centinela Ave.	1.123	F	1.139	F	0.016	Yes	1.129	F	0.006	No
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.											

Table III-38
Existing with Project with Mitigation Conditions – Intersection Level of Service, PM Peak Hour

No.	Intersection	Existing Conditions		Existing with Project		Change in V/C	Significant Impact	Existing with Project with Mitigation		Change in V/C	Significant Impact
		V/C	LOS	V/C	LOS			V/C	LOS		
5	Sepulveda Blvd. & Centinela Ave.	0.927	E	0.946	E	0.019	Yes	0.936	F	0.009	No
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.											

Construction Traffic

The Proposed Project would require the use of haul trucks during demolition, site clearing, excavation, and the use of a variety of other construction vehicles throughout the construction of the Proposed Project.

Construction Worker Trips

Construction worker traffic would vary depending on the type of construction phase. As estimated in the CalEEMod program for the Proposed Project (see Appendix A of this IS/MND), the Proposed Project would add approximately 15 worker trips/day during the demolition phase (22 days), 10 worker trips/day during the grading phase (66 days), 165 worker trips/day during the building construction phase (347 days), and 33 worker trips/day during the architectural coatings phase (88 days). Therefore, the construction worker trips would be temporary and would be a fraction of the operational traffic. As such, it is not anticipated that they would contribute to a significant increase in the overall congestion in the Project vicinity. In general, construction workers are required to be on site before the weekday morning commuter peak period (prior to 7 A.M.) and would leave before or after the afternoon commuter peak period (3 P.M. to 6 P.M.). Thus, the construction worker trips would generally occur outside of peak commuter hours. Additionally, construction parking would be provided on-site or in adjacent lots so as not to disrupt traffic along Sepulveda Boulevard and surrounding residential neighborhoods. Therefore, traffic impacts from construction workers would be mitigated to less than significant with implementation of the Construction Management Plan.

Vendor Trips

The Proposed Project would require vendors to deliver construction materials during the 16-month building construction phase. The Proposed Project is estimated to contribute an average of 33 vendor trips per day. It is assumed that these vendor trips would occur during the allowed construction hours and outside of commuter peak hours. Therefore, the vendor trips would be less than the operational traffic would not contribute to a significant increase in the overall congestion in the Project vicinity.

Haul Truck Trips

The Proposed Project includes one level of subterranean parking. Approximately 20,000 cubic yards (cy) of soil would be excavated and hauled off-site. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity. As noted in Section II, Project Description of this IS/MND the anticipated haul route would include entering/exiting the Project Site from Sepulveda Boulevard. The local haul route traveling to the San Diego Freeway (I-405) from the Project Site would utilize Sepulveda Boulevard (southbound) and the Howard Hughes Parkway on-ramp. The local haul route traveling from the I-405 to the Project Site would utilize the Jefferson Boulevard off-ramp and Sepulveda Boulevard (southbound). It is estimated that the Proposed Project's grading/excavation phase would require a total of 2,858 trips over a 3-month period (66 days). Therefore, it is anticipated that this phase would generate approximately 44 haul trips per day (22 inbound, 22 outbound) spread uniformly throughout the construction day, outside of peak hours. Additionally, the demolition phase would require haul trucks with a maximum of 10 trips per day (5 inbound, 5 outbound). As all truck trips would occur outside of peak

hours, this would cause a minimal traffic impact to the surrounding circulation. Due to the temporary nature of the construction traffic and because it would occur outside of commuter peak hours, construction impacts would be less than significant with adherence to the DOT's Construction Management Plan conditions.

Mitigation Measures:

T-1 Increased Vehicle Trips in Culver City

- In consultation with the City of Los Angeles Department of Transportation, the Proposed Project shall make a one-time financial contribution of $50,000 to the City of Culver City towards its Intelligent Transportation System projects or projects that encourage the use of alternative modes of transportation. With this contribution, the City of Culver City accepts that a reduction of 0.01 in the v/c ratio at the intersection of Sepulveda Boulevard and Centinela Avenue is appropriate and applicable as an impact mitigation for that intersection.

b) Would the project 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?

Less Than Significant Impact. A significant impact would occur if the Proposed Project conflicts 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. The Los Angeles County Congestion Management Program (CMP) requires that new development projects analyze potential project impacts on CMP monitoring locations, if an EIR is prepared for the project. As an EIR in not being prepared for the Proposed Project, no CMP analysis is required. Nevertheless, for purposes of preparing a comprehensive study, a check was conducted against CMP Criteria. When a CMP analysis is needed, the CMP methodology requires that the Traffic Report analyze traffic conditions at all CMP arterial monitoring intersections where a project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring stations where a project will add 150 or more trips in either direction during the AM or PM weekday peak hours. If, based on these criteria the Traffic Study identifies no facilities for study, then no further traffic analysis is required.

CMP Arterial Monitoring Locations

As shown in Table III-30 and III-31, the Proposed Project would generate 74 AM peak hour trips and 92 PM peak hour trips. A review of the 2010 CMP indicated the following arterial monitoring stations that are closest to the Project Site:

- La Cienega Boulevard & Centinela Avenue
- Manchester Avenue & Lincoln Boulevard
- Manchester Avenue & Sepulveda Boulevard
- Sepulveda Boulevard & Lincoln Boulevard

Based on the trip generation and trip distribution characteristics of the Proposed Project as described earlier, additional trips added by the Proposed Project at these intersections are shown in Table III-39 below:

Table III-39
CMP Arterial Analysis – Number of Trips Added by Proposed Project

Location	Number of Trips Added by Project	
	AM	PM
La Cienega Boulevard & Centinela Avenue	10	14
Manchester Avenue and Lincoln Boulevard	2	3
Manchester Avenue & Sepulveda Boulevard	12	16
Sepulveda Boulevard and Lincoln Boulevard	7	10
Source: The Mobility Group, 6711 Sepulveda Project, Traffic Study, September 20, 2017.		

As these additional trips are all below the CMP threshold of 50 trips, it is concluded that no further CMP analysis is necessary and there would be no significant traffic impact at any CMP arterial monitoring locations.

CMP Freeway Monitoring Stations

An evaluation of the potential for Project-related traffic impacts to the freeway facilities serving the Project vicinity was also conducted. As described previously, the CMP requires a detailed analysis of potential project-related impacts to freeway mainline segments where a project could be anticipated to add 150 or more vehicles per hour in either direction during either peak hour on the subject freeway. However, as shown earlier in Table III-30 and Table III-31, the Proposed Project results in substantially fewer than 150 net directional trips during both the AM and PM peak hours, with a maximum of 60 net outbound trips during the AM peak hour and 62 net inbound trips during the PM peak hour. These low incremental volumes are well below the CMP threshold of 150 trips. It is concluded that no further freeway analysis is necessary, and the Proposed Project would not cause any significant impacts at CMP freeway monitoring locations.

Based on the findings of the Traffic Study, the Proposed Project would not add 50 or more trips during either the AM or PM weekday peak hours (i.e., of adjacent street traffic) at the CMP monitoring intersection in the Project vicinity or 150 trips to a CMP freeway monitoring station, which is stated in the CMP manual as the threshold criteria for a traffic impact assessment. Further, as discussed above, there are existing and ongoing or programmed future improvements to the highway system in the Project vicinity, which will further alleviate traffic congestion in the area. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required, and impacts would be less than significant.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Proposed Project does not include any aviation-

related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles area. Therefore, no impact would occur.

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

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

A review by LADOT concludes that the Proposed Project site plan is acceptable to LADOT, but does not constitute approval of the driveway dimensions and internal circulation schemes. Prior to the commencement of building or parking layout design efforts, the Applicant shall contact LADOT for driveway width and internal circulation requirements. This would ensure that such traffic flow considerations are designed and incorporated early into the building and parking layout plans to avoid any unnecessary time delays and potential costs associated with late design changes. It is recommended that the new driveway be a Case 2 driveway with a 30-foot wide apron for two-way Right-In/Right-Out only operations. Final LADOT approval shall be obtained prior to issuance of any building permits. Additionally, the Proposed Project shall comply with the requirements stated in the LADOT Assessment Letter. As such, the Proposed Project would include new vehicular access driveways that would meet LADOT standards and not conflict with pedestrian circulation and traffic. These Project Site access and circulation schemes would be further reviewed and approved by LADOT. Therefore, the Project's potential increase hazards due to design features or incompatible uses would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The City and County of Los Angeles identifies Sepulveda Boulevard, adjacent to the Project Site, as a selected disaster route.[70,71] Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, impacts to emergency response would be considered less than significant.

Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There would be no hazardous design features included in the access design or Site Plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the Site Plan review requirements of the LAFD and the LAPD to ensure that all access

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[70] *City Of Los Angeles, Department of City Planning, General Plan Safety Element, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

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

roads, driveways and parking areas would remain accessible to emergency service vehicles. Additionally, as detailed above, the Proposed Project's construction and operational traffic impacts would be mitigated to less than significant levels. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and impacts would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Although not required because an EIR is not being prepared for the Proposed Project, an analysis of potential Project impacts on the transit system was also performed, per the CMP requirements and guidelines. The estimate of base vehicle trips (unadjusted) for each Project land use was converted to person trips by applying a conversion factor of 1.4, as per CMP guidelines. The person trip numbers were then multiplied by the estimated percent taking transit for each land use. These numbers are higher in some cases than the default countywide guidelines in the CMP and therefore more conservative in this instance as they reflect the higher transit use that would occur for the Proposed Project. There would be approximately 18 net additional transit trips (4 inbound trips and 14 outbound trips) in the AM peak hour due to the Proposed Project, and approximately 24 additional transit trips (16 inbound and 8 outbound) in the PM peak hour. The highest number of additional transit trips would therefore occur in the PM peak hour. The peak capacity of the transit system serving the Project Site is approximately 1,780 persons in the PM peak hour. The volume of peak hour trips added by the Proposed Project would be 24 trips. As this would be only about 1% of total transit capacity, it is concluded that the Proposed Project would not cause the capacity of the transit system to be substantially exceeded and therefore that the Proposed Project would not create any significant impacts on the transit systems serving the Project Area.

There is a Class II bike lane on Sepulveda Boulevard. The Proposed Project may cause temporary and intermittent disruption in pedestrian, bikeway systems, and vehicle circulation during the Proposed Project's construction phase. Implementation of DOT's standard Construction Management Plan conditions would ensure that the development of the Proposed Project would not cause a significant permanent disruption of public transportation services, pedestrian circulation, or bikeway systems, and impacts would be mitigated to less than significant levels.

Cumulative Impacts

Potentially Significant Unless Mitigation Incorporated. Development of the Proposed Project in conjunction with the 21 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the surrounding area. As noted in Table III-34, above, one study intersection would be significantly impacted by Project traffic under Future with Project (2020) conditions during the PM peak hour. As shown in Table III-37, Mitigation Measure T-1 would reduce traffic at the intersection of

Sepulveda Boulevard and Centinela Avenue. Therefore, the Proposed Project's cumulative impacts would be mitigated to a less than significant level.

XVII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by Public Resources Code Section 5020.1(k)?

Less Than Significant Impact. Public Resources Code Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or if such resource is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. PRC 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project Site is located in a highly urbanized area of the Westchester-Playa del Rey Community Plan Area of the City of Los Angeles, and has been partially disturbed by past development activities along with associated control/maintenance of existing buildings. The Proposed Project includes subgrade preparation that would involve the excavation and export of approximately 20,000 cubic yards of soil. Thus, the potential exists for the accidental discovery of archaeological materials and tribal cultural resources. Based on a review of the Archaeological and Tribal Cultural Resources Assessment for the adjacent 6733 Sepulveda Residential Project, performed by SWCA (October 2017), a California Historical Resources Information System (CHRIS) records search identified 29 cultural resource investigations that have been previously conducted within a 0.5-mile buffer around the Project Area; one of these studies intersected the present Project Area. The record search identified six cultural resources that have been previously recorded within 0.5 mile of the Project Area. None of the resources were documented within the Project Area. A Sacred Lands File search was conducted for the adjacent property by the NAHC with negative results. Background research for cultural resources did not identify any previously recorded archaeological sites in

the Project Area directly, but sites were identified within the 0.5-mile buffer, including prehistoric and historic period Native American sites, and non-Native American historic period sites. When considering the environmental setting, archaeological investigations, historical record of land-use and occupation, and accounts of Gabrieleño/Tongva tribal members, SWCA considers the project vicinity, broadly, to be sensitive for prehistoric and historic period Native American activity. Archival research indicates that the southern and western sections of the Project Area have not been intensively developed historically. During the late nineteenth and early twentieth centuries much of the surrounding areas were used for agricultural activities; however, the Project Area was not heavily utilized and exhibited only minimal grading. The only development on the Project Site consists of a former self-storage facility and its associated surface parking, which were built in 1955. No other development or mass ground disturbance has occurred at the Project Site. The highest potential for the presence of prehistoric and historic period Native American archaeological material is in undisturbed (i.e., native) sediments. The likelihood of encountering these types of sediments is high in this Project Area as much of the southern and western portion of the Project Area appeared to have been undisturbed during the historical or contemporary period. Therefore, the potential for non-Native American archaeological material to be present within the Project Area is considered to be moderate in the Project Area. Conversely, because the Project Area has not been subject to development during the historical period, the potential for historic-age archaeological deposits is considered to be low. Due to the amount of earthwork required for the development of the Project and the high likelihood of discovery of prehistoric and historic period Native American archaeological material in undisturbed native sediments, implementation of standard regulatory compliance measures and best management practices discussed earlier under Checklist Question V(b), Archaeological Resources would ensure potential impacts to tribal resources are reduced to less than significant levels.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe?

Less Than Significant Impact. Pursuant to AB 52, the Department of City Planning sent pre-consultation request letters to the recognized Native American Tribal Representatives within the Los Angeles region. On October 26, 2017 the City of Los Angeles received a request for consultation from the Gabrieleño Band of Mission Indians-Kizh Nation (Tribal Group). The consultation process was initiated by Department of City staff and included an exchange of phone conversations and emails. Information provided by the Tribal Group during the consultation process included an extract from an unidentified source describing the Gabrieleño community near the Ballona Creek and maps from 1898, 1901 and 1938 depicting area in the vicinity of the Ballona Creek. On June 28 and July 25, 2018, Department of City Planning Staff requested further information to support the tribes request for on-site monitoring. However, the City has yet to receive any substantive evidence that would allow the City to require a monitor through mitigation. In a written correspondence concluding the consultation process dated July 31, 2018, the City informed Tribal Group that the City is willing to adopt conditional language in its determination regarding the inadvertent discovery of any potential Tribal Cultural Resource onsite there should there be an unanticipated discovery. Thus, adherence to the standard conditions of approval language provided in the City's July 31, 2018

correspondence to the Tribal Group (see Appendix J.1) would ensure impacts associated with the accidental discovery of any Native American tribal resources would be avoided or reduced to less than significant levels.

XVIII. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles RWQCB (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a public facility and is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Therefore, impacts associated with wastewater treatment requirements would be less than significant**.**

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than

100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[72] The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[73]

As shown in Table III-40, below, the Proposed Project would generate a net increase in water demand of approximately 29,651 gallons per day (gpd) of water, which is significantly below available capacity. Because the Proposed Project is consistent with the zoning and General Plan land use designations, and the Project's population growth is within SCAG's forecast, the Project's increased water demand would not measurably reduce the LAAFP's treatment capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Table III-40
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Conditions			
Self-Storage Facility	18,849 sf	0.036 gpd/sf	679
		Total Existing Water Demand:	***679***
Proposed Project			
Residential Units (180 total du)			
Studio	18 du	90 gpd/du	1,620
One Bedroom	116 du	132 gpd/du	15,312
Two-Bedroom	46 du	180 gpd/du	8,280
Lounge	800 sf	0.06 gpd/sf	48
Health Club/Spa	6,500 sf	0.78 gpd/sf	5,070
		Total Project Water Demand:	***30,330***
		Less Existing Water Demand:	*-679*
		Net Water Demand:	**29,651**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Based on Sewer Capacity Availability Request and Approval Letter, April 24, 2017. (Contained in Appendix H). Water consumption is assumed to be 120% of wastewater generation.*
Parker Environmental Consultants, 2017.

[72] *U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization-–-oxygen-plant-replacement, accessed October 2017.*
[73] *Los Angeles Department of Water and Power, website: http://www.ladwp.com/, accessed September 2015.*

A Service Advisory Request/Fire Service Pressure Flow Report (SAR) prepared by LADWP, dated April 27, 2017 and included in Appendix H of this IS/MND, indicates that the Project Site is currently served by a 12-inch water main in Sepulveda Boulevard, which provides sufficient flow and pressure for both fire and domestic water service at the Project Site. Based on this determination, there are no known problems or water deficiencies in the Project Site area. Although no system upgrades are anticipated at this time, the water system will be verified again at the time of construction as required as part of the City's permitting process. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) any required work would be performed within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Fire Flow Requirements

As noted above, a SAR was prepared by LADWP for the Proposed Project. Proposed service for the Project Site would be provided by the eight-inch service from the 12-inch main in Sepulveda Boulevard on the west side approximately 700 feet south of Centinela Avenue. The system maximum pressure is 79 psi based on street curb elevation of 38 feet above sea level at this location, and a flow of 2,500 gpm can be provided to the Project Site at 70 psi.[74] Based on the approval of the SAR, fire flow requirements would be considered adequate at the Project Site, and development of the Project Site would result in a less than significant impact to fire flow requirements.

Electricity Supply

The correspondence from Metropolitan Service Planning states that electric service is available to serve the Proposed Project and would be provided in accordance with the Department of Water and Power Rules and Regulations. The estimated power requirement for the Proposed Project would be part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power Integrated Resource Plan incorporates the estimated power requirement for the Proposed Project through the load forecast input and has planned sufficient resources to supply the electricity needs.[75]

The Proposed Project may require power line extensions to the Project Site and new electricity infrastructure (e.g. a transformer) on site, which would be typical of such construction projects and would follow all mandatory regulations in coordination with LADWP. As such, discussed in the correspondence with LADWP and stated above, existing electricity infrastructure and system would adequately serve the

[74] *City of Los Angeles, Department of Water and Power, Fire Service Pressure Flow Report, April 27, 2017. (Appendix H to this IS/MND)*

[75] *City of Los Angeles, Metropolitan Service Planning, Response Letter Regarding Electric Service, April 25, 2017. (Appendix H to this IS/MND)*

Proposed Project, and no significant impacts would result.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[76] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table III-41, the Proposed Project would generate a net increase of approximately 24,710 gpd of wastewater, representing a fraction of one percent of the available capacity. The estimated sewer flows were based on the sewerage generation provided in the Proposed Project's SCAR Approval Letter. A Sewer Capacity Availability Request (SCAR) has been approved for the Proposed Project (SCAR approval letter dated April 24, 2017) that permits the discharge of up to 25,275 gpd of wastewater into the existing City infrastructure, and confirms that there is sufficient capacity available to handle the anticipated discharge from the Proposed Project.[77] Based on the configuration of the sewer lines serving the Project Site, the Proposed Project's sewer flows may be routed to the lines under Sepulveda Boulevard.[78] The HWRP has a remaining capacity of 175 additional mgd, and as such would have adequate capacity to serve the Project Site. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

[76] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org, accessed October 2017.*

[77] *City of Los Angeles, Department of Public Works, Sewer Capacity Availability Request: 6711 S. Sepulveda Boulevard, April 24, 2017. (Appendix H to this IS/MND)*

[78] *City of Los Angeles Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/ index01java.cfm, accessed: October 2017.*

Table III-41
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit)	Total Wastewater Generation (gpd)
Existing Conditions			
Self-Storage Facility	18,849 sf	0.03 gpd/sf	565
		Total Existing Wastewater Generation:	**565**
Proposed Project			
Residential Units (180 total du)			
Studio	18 du	75 gpd/du	1,350
One Bedroom	116 du	110 gpd/du	12,760
Two-Bedroom	46 du	150 gpd/du	6,900
Lounge	800 sf	0.05 gpd/sf	40
Health Club/Spa	6,500 sf	0.65 gpd/sf	4,225
		Total Project Wastewater Generation:	***25,275*** [a]
		Less Existing Wastewater Generation:	*-565*
		Net Wastewater Generation:	**24,710**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Based on Sewer Capacity Availability Request and Approval Letter, April 24. 2017 (Contained in Appendix H of this IS/MND). The unit mix in the SCAR letter varies slightly from the unit mix of the Proposed Project.*
Parker Environmental Consultants, 2017.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described in Section IX (c) the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with a self-storage building and a surface parking lot. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question IX, the Project shall comply with NPDES/SUSMP requirements and the LID regulations, and implement BMPs during the construction and operation of the Proposed Project.

The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts would be considered less than significant.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table III-40, the Proposed Project's net increase in water demand would be 29,651 gallons per day. As described in Section XIII, Population and Housing, the Proposed Project is within SCAG's growth projections, upon which the 2015 UWMP is based. Through the 2015 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green), and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or

evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would ensure the Proposed Project's demands for potable water resources are less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project and related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. Through the 2015 Urban Water Management Plan, LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed in Section XIII, Population and Housing, the Proposed Project would be consistent with SCAG's growth projections for the City of Los Angeles. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 UWMP. Additionally, the Proposed Project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the Project Site or exceed the available capacity in the local aqueduct. In addition, the Project and the related projects would be required to comply with City and State regulatory requirements that promote water conservation. For example, certain related projects would be subject to the City's Green Building Code requirement to reduce indoor water use by at least 20 percent and all projects would be required to use fixtures that conserve water. In addition, certain large related projects meeting the thresholds under Senate Bill 610 would be required to prepare and receive LADWP approval of a water supply assessment that demonstrates how the project's water demand will be met. These regulatory requirements would reduce the water demand on a cumulative basis, such that impacts associated with increased water demand would be less than significant.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant

by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XVIII (b), above, the sewage flow will ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project.[79] Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on HWRP's capacity.

Local Wastewater Generation

Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the City's Department of Public Works, Bureau of Sanitation to ensure adequate sewer capacity for each related project. Since the SCAR for the Proposed Project was approved, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project's wastewater impacts would be less than cumulatively considerable.

Regional Wastewater Generation

The City adopted the Integrated Resources Plan in 2006. The Integrated Resources Plan incorporates a new City-prepared Wastewater Facilities Plan to address demand and capacity through 2020. The Integrated Resources Plan serves to update the information prepared in the 1991 Wastewater Facilities Plan, while also considering the needs of the City's recycled water and urban runoff systems. Specifically, the Integrated Resources Plan was developed to accommodate the projected increase in wastewater flow over the next 20 years while maximizing the beneficial reuse of recycled water and urban runoff and, as a result, optimizing the use of the City's existing facilities and water resources. Growth projections and data sources used in the Integrated Resources Plan were based on the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan, which estimated that the population of Los Angeles would reach almost 4.3 million people by 2020. Implementation of the Integrated Resources Plan will enable the City to adequately convey wastewater to the treatment plants with minimal potential for sewage spills. It will also enable the City to treat future wastewater flows while protecting public health and safety and meeting regulatory requirements, thereby protecting the environment and surface waters. As discussed in Section XIII, Population and Housing, the cumulative growth impacts for the Proposed Project and related projects are consistent with the SCAG's growth projections. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of HWRP's service to the City of Los Angeles and surrounding area. As shown in Table III-42, the wastewater generation of the related projects and the Proposed Project would contribute 571,553 gpd of wastewater. Of the 175 mgd available

[79] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org, accessed October 2017.*

Table III-42
Estimated Cumulative Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Related Projects			
Dwelling Units [b]	1,532 du	150 gpd/du	229,800
Hotel	183 rooms	120 gpd/du	21,960
Office	1,843,909 sf	0.12 gpd/sf	221,269
Production and Stage Support	1,129,900 sf	0.05 gpd/sf	56,495
Restaurant (3,999 sf)	178 seats	25 gpd/seat	4,450
Retail	295,147 sf	0.025 gpd/sf	7,379
Schools	610 students	9 gpd/student	5,490
		Total Related Projects Wastewater Generation:	**546,843**
		Total Project Wastewater Generation:	24,710
		TOTAL CUMULATIVE:	**571,553**
		Project % of Cumulative:	**4%**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day, stu = student
[a] *City of Los Angeles, Bureau of Sanitation, Sewerage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*
[b] *Dwelling units include condominiums and multi-family residential units. Consumption rate was based on two bedrooms per unit as a conservative estimate.*
Parker Environmental Consultants, 2017.

in HWRP during a dry weather day, the cumulative demand of 0.57 mgd accounts for approximately 0.3% of the available capacity and would not significantly reduce its capacity. It is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project based on the implementation of the Integrated Resource Plan. Based on continued implementation of the Integrated Resources Plan, the demands of the Proposed Project and related projects in relation to wastewater treatment, when considered cumulatively, would result in less than significant impacts.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste

Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. State law currently requires at least 50% solid waste diversion and establishes a state-wide goal of 75% diversion by 2020. Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 62.1 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 21 years. An expansion of the Chiquita Canyon Landfill to add a capacity of 48,114,000 tons (a 45-year life expectancy based on 2015 average daily disposal of 3,446 tons per day or 15 years based on maximum permitted rate of disposal of 10,000 tons per day) was approved in April 2017.

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. The Proposed Project would include a total of 160,830 square feet of residential floor area (including common floor area). Based on the construction of the new floor area, it is estimated that the construction of the Proposed Project would generate approximately 2,489 tons of debris during the demolition and construction process (see Table III-43, below), plus an additional 20,000 cy of soil export during the excavation phase. All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts inert construction waste and yard waste from areas within the County of Los Angeles. The Sunshine Canyon Landfill is located approximately 27 miles north of the Project Site. For recycling efforts, Southern California Disposal facility

Table III-43
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a] [b]	Generated Waste (tons)
Demolition			
Self-Storage Facility	18,849 sf	155 lbs/sf	1,461
Paved Surface Parking Lot [c]	25,000 sf (463 cy)	2,400 lbs/cy	676
Construction			
Residential (180 dwelling units)	160,830 sf	4.38 lbs/sf	352
		Total Debris:	**2,489**

Notes:
sf = square feet; lbs = pounds
[a] *CalRecycle, Solid Waste Cleanup Program Weights and Volumes for Project Estimates, http://www.calrecycle.ca.gov/swfacilities/cdi/Tools/Calculations.htm, accessed October 2017.*
[b] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
[c] *Assumes that parking lot is 0.5 feet in depth.*
Source: Parker Environmental Consultants, 2017.

(located at 1908 Frank Street in the City of Santa Monica) accepts construction and demolition waste for recycling and is located approximately seven miles northwest from the Project Site (approx. 14 miles round trip). Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

As shown in Table III-44, Estimated Operational Solid Waste Generation, the Proposed Project's net additional generation during operation of the Proposed Project would be 2,107 pounds per day (or approximately 1.05 tons per day), which is well within area landfills' capacities. This estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services.

Implementation of the following code compliance measures would further reduce the Project's impacts on solid waste generation. In compliance with the LAMC, the Proposed Project shall provide readily accessible recycling 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 order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which have totaled 70% by 2013, the Applicant would salvage and recycle construction and demolition materials to ensure that a minimum of 70% of construction-related solid waste that can be recycled is diverted from the waste stream. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70%. 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. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and

Table III-44
Estimated Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Conditions			
Self-Storage Facility	18,849 sf	0.005 lbs/sf/day	94
		Total Existing Solid Waste Generation:	***94***
Proposed Project			
Multi-Family Residential	180 du	12.23 lbs/du/day	2,201
		Total Project Site Solid Waste Generation:	***2,201***
		Less Existing Solid Waste Generation:	*-94*
		Net Solid Waste Generation:	**2,107**

Notes: sf =square feet; du = dwelling units
Source:
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
Parker Environmental Consultants, 2017.

other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

The amount of solid waste generated by the Proposed Project is within the available capacities of area landfills, and the Proposed Project's impacts to regional landfill capacity would be less than significant.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Proposed Project would generate solid waste that is typical of a residential building. The Proposed Project would comply with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, the Project's solid waste impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 21 related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles and Culver City. Table III-45 shows the cumulative solid waste generation in pounds per day. The cumulative operational solid waste generation of the related projects and Proposed Project would contribute approximately 47,349 pounds of additional solid waste per day (or approximately

Table III-45
Estimated Cumulative Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Related Projects			
Dwelling Units [b]	1,532 du	12.23 lbs/du/day	18,736
Hotel	183 rooms	2 lbs/room/day	366
Office	2,986,009 sf	0.006 lbs/sf/day	17,916
Retail (299,146 sf)	781 emp	10.53 lbs/employee/day	8,224
		Related Projects Total:	***45,242***
		Proposed Project Net Total:	2,107
		CUMULATIVE TOTAL:	**47,349**
		Project % of Cumulative:	**4%**

Notes: sf =square feet; du = dwelling units; emp = employee
Uses not listed are estimated by the closest type of use available in the table.
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Dwelling units include condominiums and multi-family residential units.*
[c] *Generation rates are based on 1 employee per 383 square feet of retail/commercial for a conservative estimate.*
- Conversions of floor area per occupant based on California Building Code (2016), Ch.10, Table 1004.1.2.
Parker Environmental Consultants, 2017.

8,641 tons of solid waste per year), which represents a fraction of one percent of the current remaining capacity of the Sunshine Canyon Landfill, which has a remaining permitted capacity of approximately 62.1 million tons, and Chiquita Canyon Landfill, which was approved for a 48 million ton expansion.

Based on the 2016 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 103.5 million tons in the year 2029 will exceed the 2016 remaining permitted Class III landfill capacity of 103.2 million tons.[80] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the CoIWMP Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

[80] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.*

The City of Los Angeles Solid Waste Integrated Resources Plan sets forth strategies that would provide adequate landfill capacity through 2031 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[81] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030.

Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less-than-significant cultural resource impacts provided the regulatory compliance measures listed above are implemented. The Proposed Project would 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, no impact would occur.

[81] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other 21 related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, and utilities and service systems would be less than significant with mitigation. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified within this IS/MND.

APPENDIX F: ENERGY CONSERVATION

Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal:

1. Decreasing overall per capita energy consumption,

2. Decreasing reliance on fossil fuels such as coal, natural gas and oil, and

3. Increasing reliance on renewable energy sources.

The Proposed Project would develop a multi-family residential building on an infill site, which would contribute to the revitalization of the Westchester-Playa del Rey Community Plan area. The Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The

standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.[82] The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

Existing Infrastructure

Electricity

The Project Site is located in a highly urbanized area in the Westchester-Playa del Rey Community. Based on substructure records, there is an underground electrical line perpendicular to Sepulveda Boulevard. The underground electrical line daylights to an existing power pole located within the existing public right-of-way at the northeast corner of the Project Site. The electrical line runs along the power pole and connects overhead to an adjacent pole 100 feet to the west. This western pole has an overhead line that feeds into the existing onsite building. There are no other overhead connections to adjacent properties. The power pole located in the public right-of-way also has an underground line that connects to a vault in the sidewalk fronting the Project Site.[83]

The Proposed Project would require onsite transformation and may require underground line extension on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

A Will Serve Letter was received from LADWP on April 25, 2017 confirming the availability of electric service for the Proposed Project. (See Appendix H of this IS/MND). Electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of

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[82] *California Energy Commission, 2016 Building Energy Efficiency Standards, website: http://www.energy.ca.gov/title24/2016standards/, accessed May 2017.*

[83] *Fuscoe Engineering, Inc., Civil Engineering Due Diligence Report, 6711 Sepulveda Blvd. Multifamily Residential, June 29, 2017. (See Appendix H of this IS/MND)*

the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.

Natural Gas

Substructure records indicate that Southern California Gas Company operates a 2-inch gas line, 8 feet from the property line in Sepulveda Boulevard. The main line from Sepulveda is a viable candidate to provide service to the property.[84] A Will Serve Letter and Gas System Map was received from Southern California Gas Company on May 2, 2017 confirming the availability of gas service for the Proposed Project. (See Appendix H of this IS/MND).

Energy Consumption

Construction

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of soil, asphalt, and building debris from the Project Site during the demolition/site clearing phase. The excavation phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the excavation, grading, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process.

Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration, the amount of diesel and petroleum-based gasoline (E10)[85] consumed can be estimated based on CO_2 emissions.[86] Burning one gallon of diesel fuel generates approximately 22.38 pounds of CO_2. Burning one gallon of petroleum-based gasoline with 10 percent ethanol content (E10) produces approximately 17.68 pounds of CO_2 emissions. Based on the U.S. Energy Information Administration fuel consumption factors identified above, and the Proposed Project's estimated "Total CO_2" emissions presented in Appendix A of this IS/MND, Air Quality Modeling Worksheets, it is estimated that the construction of the Proposed Project would consume a total of approximately 154,570 gallons of fuel, including approximately 76,703 gallons of diesel fuel and 77,867 gallons of gasoline.[87]

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would

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[84] *Ibid.*

[85] *Blends of petroleum-based gasoline with 10% ethanol, commonly referred to as E10, account for more than 95% of the fuel consumed in motor vehicles with gasoline engines, U.S. Energy Information Administration, website: http://www.eia.gov/todayinenergy/detail.php?id=26092, accessed October 2017.*

[86] *U.S. Energy Information Administration, website: http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11, accessed October 2017.*

[87] *Refer to Fuel Consumption Calculations included as Appendix I in this IS/MND.*

not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

Operation

Electricity

As shown in Table III-46, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 757,186 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.

Table III-46
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Generation Rate [a]	Unit	Total (kilowatt hours/year)
Existing Uses				
Self-Storage Facility	18,849 sf	13.55	kWh/sf/year	255,404
			Total Existing Electricity Consumption:	**255,404**
Proposed Project				
Residential Uses	180 du	5,626.5	kWh/unit/year	1,012,590
			Proposed Project Total Electricity Consumption:	**1,012,590**
			Less Existing Electricity Consumption:	*-255,404*
			Net Electricity Demand	**757,186**

Notes:
du: dwelling unit; sf: square feet; kWh = kilowatt-hour
[a] SCAQMD CEQA Air Quality Handbook, 1993.
Source: Parker Environmental Consultants, 2017.

The Proposed Project would include energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY STAR-rated appliances for residential dwelling units,

low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, the Proposed Project's 180 residential units would incorporate energy conservation features. As mentioned above, a Will Serve Letter was received from LADWP on April 25, 2017 confirming the availability of electric service for the Proposed Project. (See Appendix H of this IS/MND). Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of electricity.

Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company ("SCG"). Gas supply available to SCG from California sources averaged 122 million cf/day in 2015. SCG projects total natural gas demand to decrease at an annual rate of 0.6 percent per year from 2016 to 2035. This decrease is due to more efficient power plants, pursuing demand-side reductions, and the acquisition of preferred power generation resources that produce little or no carbon emissions. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG's projection for natural gas also decreases. Interstate pipeline delivery capability into SCG on any given day is theoretically approximately 6,725 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SCG's estimated physical capacity of upstream pipelines. SCG's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 83 billion cubic feet is allocated to residential, small industrial and commercial customers.[88] As shown in Table III-47, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 667,408 cubic feet per month, would represent a very small fraction of one percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 83 billion cubic feet as of 2016.

Table III-47
Estimated Natural Gas Consumption by the Proposed Project

Land Use	Size	Generation Rate[a]	Unit	Total (cubic feet/month)
Existing Conditions				
Self-storage Facility	18,849 sf	2.9	cf/sf/month	54,662
			Total Existing Natural Gas Consumption:	**54,662**
Proposed Project				
Residential Uses	180 du	4,011.5	cf/unit/month	722,070
			Proposed Project Total Natural Gas Consumption:	**722,070**
			Less Existing Natural Gas Consumption:	*-54,662*
			Total Net Increase in Natural Gas Consumption	**667,408**

Notes: du: dwelling unit; sf: square feet
[a] *SCAQMD CEQA Air Quality Handbook, 1993.*
Source: Parker Environmental Consultants, 2017.

[88] *California Gas and Electric Utilities, 2016 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, accessed October 2017.*

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of natural gas.

Fossil Fuels

Approximately 182,340 gallons of gasoline fuel would be utilized by mobile sources annually during operation of the Proposed Project.[89] However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. The Project Site is located in the Westchester-Playa del Rey area, which is highly connected to the regional transit network in the Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including the LADOT Commuter Express is also present. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"), although other public transit providers, including LADOT Commuter Express and Culver City bus lines also provide service within or near the Project area. Specifically, a total of six bus lines, including Metro lines 110 and 217; Culver City lines 3 and 6 and Rapid 6, and LADOT Commuter Express 574. These bus lines currently serve the Project Site via stops located within convenient walking distance along Sepulveda Boulevard and Centinela Avenue. Due to its proximity to the bus lines aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Additionally, as an infill development, Proposed Project would include multi-family residential land uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Traffic Study (see Appendix F of this IS/MND), a reduction of 15% for resident transit/walking utilization was applied for the trips generated by the residential uses. Prior to trip reductions, the Proposed Project would utilize approximately 212,638 gallons of gasoline fuel annually. As mentioned above, the Proposed Project would demand approximately 182,340 gallons of gasoline annually, which results in a 14% decrease compared to fuel consumption prior to implementing a transit/walking utilization. The reduction in vehicle trips, due to the Proposed Project's location in a transit-oriented district, would therefore decrease the Proposed Project's reliance on fossil fuels. As such, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of fossil fuels and would promote walking, biking, and other modes of public

[89] *Refer to Fuel Consumption Calculations included as Appendix I in this IS/MND.*

transportation.

Renewable Energy

The LADWP's 2015 Power Integrated Resource Plan (IRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost-effective manner. The 2015 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2015 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives: (1) Eliminate Coal from LADWP's Power Supply, (2) Reach 33 percent renewable portfolio standard by 2020 and 50 percent by 2030, including a goal of 800 MW Local Solar, (3) Achieve 15 percent energy efficiency by 2020, (4) Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029, (5) Invest in the Power System Reliability Program, and (6) Promote a high scenario of Transportation Electrification. As the Proposed Project would derive its electricity from the LADWP, the project's energy demands will primarily be derived from renewable energy sources. On a project specific level, the Proposed Project includes the following features which will further reduce energy demands:

- *Proximity to mass transit:* The Project Site is an infill site within a Transit Priority Area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.

- *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a former self-storage facility and a surface parking lot, which is located in a highly developed area of the Westchester-Playa del Rey Community Plan area. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

- *Trip Reduction:* In addition to its location in a Transit Priority Area, the Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 18 short-term bicycle parking spaces and 180 long-term bicycle parking spaces, for a total of 198 bicycle parking spaces. The Proposed Project proposes to provide 198 spaces, which is consistent with the requirements in the LAMC.

- *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy.

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V. REFERENCES AND ACRONYMS

1. REFERENCES

California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017.

California Assembly Bill No. 744, Planning and Zoning: Density Bonuses, website: *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB744*, accessed October 2017.

California Building Code (2016), Chapter 10: Means of Egress, Table 1004.1.2 – Maximum Floor Area Allowances per Occupant.

California Building Industry Association v. Bay Area Air Quality Management District (S213478, December 17, 2015).

California Department of Conservation, State of California Williamson Act Contract Land Map 2015-2016, website: *http://www.conservation.ca.gov/dlrp/lca*, accessed October 2017.

California Department of Resources Recycling and Recovery (CalRecycle), Solid Waste Cleanup Program Weights and Volumes for Project Estimates, website: http://www.calrecycle.ca.gov/swfacilities/cdi/Tools/Calculations.htm, accessed October 2017.

California Department of Transportation, California Transportation Plan 2040, June, 2016, website: *http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf*, accessed October 2017.

California Department of Transportation, Technical Noise Supplement, 2009.

California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.

California Energy Commission, 2016 Building Energy Efficiency Standards, website: *http://www.energy.ca.gov/title24/2016standards/*, accessed October 2017.

California Gas and Electric Utilities, 2016 California Gas Report, website: *https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf*, accessed October 2017.

Carrier Corporation, Product Data Sheet for 25 HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons).

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

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

City of Los Angeles, Air Quality Element of the General Plan, November 24, 1992.

City of Los Angeles, Bureau of Engineering, Navigate LA, website: *http://navigatela.lacity.org/index01java.cfm*, accessed October 2017.

City of Los Angeles, CEQA Thresholds Guide, 2006.

City of Los Angeles Citywide General Plan Framework EIR, July 17, 1996.

City of Los Angeles, Department of City Planning, 2015 Growth and Infrastructure Report, November 2016.

City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: *www.zimas.lacity.org*, accessed October 2017.

City of Los Angeles, Department of City Planning, Coastal Transportation Corridor Specific Plan, Ordinance No. 168,999, effective September 22, 1993.

City of Los Angeles, Department of City Planning, Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Westchester-Playa del Rey Community Plan Area, website: *http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Wch&sgo=ct&rpt=PnH&yrx=Y09*, accessed October 2017.

City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, September 1996.

City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996.

City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Areas Containing Significant Mineral Desposits in the City of Los Angeles, September 1996.

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

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

City of Los Angeles Department of City Planning, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, adopted December 11, 1996 and re-adopted August 8, 2001.

City of Los Angeles Department of City Planning, General Plan Elements, website: *https://planning.lacity.org/GP_elements.html,* accessed October 2017.

City of Los Angeles, Department of City Planning, Housing Element 2013-2021, Chapter 3: inventory of Sites for Housing, pg 3 – 6, adopted December 3, 2013.

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

City of Los Angeles, Department of City Planning, Office of Historic Resources, Los Angeles Historic Resources Inventory, website: *http://www.historicplacesla.org/map*, accessed October 2017.

City of Los Angeles, Department of City Planning, Office of Historic Resources, SurveyLA, Historic Resources Individual Resources, Westchester-Playa del Rey Community Plan Area, November 25, 2013.

City of Los Angeles Department of City Planning, Westchester-Playa del Rey Community Plan, April 13, 2004.

City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: *http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf*, accessed October 2017.

City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: *https://lacitysan.org,* accessed October 2017.

City of Los Angeles Department of Recreation and Parks, Facility Locator, website: *http://www.laparks.org*/, accessed October 2017.

City of Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities. Fifth Edition, May 9, 2016.

City of Los Angeles, Green Building Code (Ordinance No. 181,480).

City of Los Angeles Municipal Code.

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

City of Los Angeles Public Library, Locations & Hours, website: *http://www.lapl.org/branches*, accessed October 2017.

City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.

County of Los Angeles Department of Public Works, 2016 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, September 2017.

County of Los Angeles Department of Public Works, Construction and Demolition Debris Recycling Facilities in the Los Angeles County, Updated January 18, 2017. Website: *https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf*, accessed October 2017.

Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel Number 06037C1610F, September 26, 2008, website: *https://msc.fema.gov/portal/search,* accessed October 2017.

Federal Transit Administration (Harris Miller Miller & Hanson), Transit Noise and Vibration Impact Assessment, May 2006.

Google Earth Pro, Version 7.3.0.3832, accessed October 2017.

Harris, Cyris M., Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991.

Institute of Transportation Engineers, Trip Generation Manual – 9th Edition, 2012.

Los Angeles County, Airport Land Use Commission (ALUC), Los Angeles International Airport, Airport Influence Area, May 13, 2003.

Los Angeles County Department of Public Works, Los Angeles West Area Disaster Route Map, August 13, 2008.

Los Angeles County Congestion Management Plan (CMP), 2010.

Los Angeles Fire Department, 2014 City of Los Angeles Fire Code.

Los Angeles Police Department, COMPSTAT Unit, Pacific Area Profile, October 2017.

Los Angeles Times Local, Mapping L.A. LAPD Pacific Division, Reporting District 1466, website: *http://maps.latimes.com/lapd/reporting-district/1466*/, accessed October 2017.

Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012.

Los Angeles Unified School District, Resident School Identifier, website: *http://rsi.lausd.net/ResidentSchoolIdentifier*/, accessed October 2017.

Los Angeles Unified School District, School Facilities Needs Analysis, September 2012.

National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.

Senate Bill 375, September 2008.

Senate Bill 743, September 2013.

South Coast Air Quality Management District, 2016 Air Quality Management Plan, March 2017.

South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod Version 2016.3.2), 2017.

South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.

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

South Coast Air Quality Management District, Rule 402, Rule 403, Rule 1113, and Rule 1138.

Southern California Association of Government, 2016-2040 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Demographics and Growth Forecast Appendix, adopted April 2016.

Southern California Association of Governments, Regional Comprehensive Plan and Guide.

Southern California Association of Governments, Regional Transportation Plan, 2016-2040, website: *http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf*, accessed October 2017.

State of California Assembly Bill (AB 32), *the California Global Warming Solutions Act of 2006*, 2006.

State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. *ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf*, accessed October 2017.

State of California, Department of Conservation, Division of Mines and Geology, Seismic Hazards Zone Report for the Venice 7.5-Minute Minute Quadrangle, Los Angeles County, California, 1998.

Stormwater LID Ordinance (No. 181899), 2011.

Title 24 of the California Code of Regulations.

U.S. Department of Energy, Better Buildings, Showcase Project: Los Angeles Aqueduct Filtration Plant Modernization – Oxygen Plant Replacement, website: *https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization-–-oxygen-plant-replacement*, accessed October 2017.

U.S. Energy Information Administration, website: http://www.eia.gov/todayinenergy/detail.php?id=26092, accessed October 2017.

U.S. Energy Information Administration, website: http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11, accessed October 2017.

United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

USEPA Report No. EPA530-98-010. *Characterization of Building Related Construction and Demolition Debris in the United States,* June 1998.

2. ACRONYMS AND ABBREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System

CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City Zoning Code	City of Los Angeles Planning and Zoning Code
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas

gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable

MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commision
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act

RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal

TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System