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:** 15
PROJECT TITLE: 550 S. Palos Verdes Mixed Use	**ENVIRONMENTAL CASE:** ENV-2016-625-MND	**CASE NO.** DIR-2016-624-CDO-SPR

PROJECT LOCATION: 550 S. Palos Verdes Mixed-Use

PROJECT DESCRIPTION:
Demolition of two commercial buildings and existing surface parking lots and the construction of a seven-story, up to 83-foot tall building with 404 apartment units, 5,200 square feet of retail uses, and 641 parking spaces, totaling approximately 385,300 square feet of floor space. The project would be developed on two parcels. The project site would have access to ground floor retail parking via a driveway from 6th Street. Access to the subterranean residential parking garage would be provided via 5th Street. The following approvals may be included as part of the project: (1) Site Plan Review; (2) Compliance with the San Pedro Community Design Overlay Plan; (3) Adoption of the Initial Study/Mitigated Negative Declaration; (4) Grading/Building Permits; 5) request for a haul route for the export of 100,000 cubic yards of soil; and 6) a Director's Decision to permit up to a 10% reduction in open space.

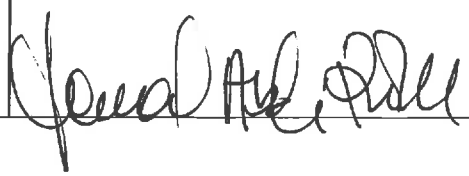
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Omninet Capital San Pedro, LLC
9420 Wilshire Boulevard, Fourth Floor
Beverly Hills, CA 90212

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 will 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 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**
Matthew Lum	Planning Assistant	(213) 978-1172
ADDRESS 200 North Spring Street, 7th Floor Los Angeles, CA 90012	**SIGNATURE (Official)** 	**DATE** Oct. 5, 2016

MITIGATION MEASURES

Aesthetics

I-10 Aesthetics (Landscape Plan)

Environmental impacts to the character and aesthetics of the neighborhood may result from project implementation. However, the potential impacts will be mitigated to a less than significant level by the following measure:

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

I-120 Aesthetics (Light)

Environmental impacts to the adjacent residential properties may result due to excessive illumination on the project site. However, the potential impacts will be mitigated to a less than significant level by the following measure:

> Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

I-130 Aesthetics (Glare)

Environmental impacts to adjacent residential properties may result from glare from the proposed project. However, the potential impacts will be mitigated to a less than significant level by the following measure:

> The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

I-200 Aesthetics (Screening on Parking Garages)

> Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the Project Site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the Project Site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.

Biology

IV-10 Habitat Modification (Nesting Native Birds, Hillside or Rural Areas)

The project will result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The following measures are as recommended by the California Department of Fish and Game:

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1-August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause

abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

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

IV-70 Tree Removal (Non-Protected Trees)

Environmental impacts from project implementation may result due to the loss of significant trees on the site. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

IV-90 Tree Removal (Public Right-of-Way)

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

Geology and Soils

VI-20 Erosion/Grading/Short-Term Construction Impacts

Short-term erosion impacts may result from the construction of the proposed project. However, these impacts can be mitigated to a less than significant level by the following measures:

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

VI-40 Grading (20,000 Cubic Yards, or 60,000 Square Feet of Surface Area or Greater)

Impacts will result from the alteration of natural landforms due to extensive grading activities. However, this impact will 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. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.
- "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- Movement and removal of approved fencing shall not occur without prior approval by LADBS.

Green House Gas Emissions

VII-10 Greenhouse Gas

Environmental impacts may result from project implementation due to increased greenhouse gas emissions. However, the impact can be reduced to a less than significant level through compliance with the following measure(s):

- Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.
- To encourage carpooling and the use of electric vehicles by Project residents and visitors, at least twenty (20)% of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Noise

XII-20 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- 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.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- A temporary noise control barrier shall be installed on the property line of the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10dBA. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all activities on the project site are complete.

XII-40 Increased Noise Levels (Parking Structure Ramps)
Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-60 Increased Noise Levels (Mixed-Use Development)
Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

Public Services

XIV-10 Public Services (Fire)
Environmental impacts may result from project implementation due to the location of the project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:

- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit 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 or approved fire lane.

XIV-30 Public Services (Police)
Environmental impacts may result from project implementation due to the location of the project in an area

having marginal police services. However, this potential impact will be mitigated to a less than significant level by the following measure:

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

XIV-50 Public Services (Schools affected by Haul Route)

- LADBS shall assign specific haul route hours of operation based upon Port of Los Angeles High School(s) hours of operation.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

Transportation

XVI-1 A. Highway Dedication and Physical Street Improvements.

1. Traffic Signalization at 6th and Gaffey Streets. Although the traffic study report has not assigned a specific measure of significance to the project effect at this intersection, in order to insure the opportunity to provide a full accounting of any potential safety issues that may need to be addressed, DOT is recommending that the project provide the City with a Guarantee Agreement that will allow for additional analysis to be conducted at this location for a term of five (5) years, beginning with the issuance of the project certificate of occupancy by the Department of Building and Safety. The initial funding amount to be guaranteed through this agreement shall be $50,000 and shall be immediately transferred to DOT upon written notice that the City has made a determination to move forward with the improvement. Should other funding sources become available, the final funding amount could be reduced. If at the end of the five (5) year term, DOT has determined that a traffic signal is not warranted, the agreement shall be terminated.

2. Highway Dedication. The applicant shall further consult the Bureau of Engineering (BOE) for any additional highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE.

B. Construction Impacts: A construction work site traffic control plan shall be submitted to DOT's Southern District Office for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of

operation, protective devices, warning signs and access to all abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

C. Site Access and Internal Circulation: This determination does not include approval of the proposed project's driveways, internal circulation, and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant shall consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

D. Development Review Fees: An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to the Department of Transportation for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

XVI-30 Transportation

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The applicant shall be limited to no more than two trucks at any given time within the site's staging area.
- There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
- No hauling shall be done before 9 a.m. or after 3 p.m.
- Trucks shall be spaced so as to discourage a convoy effect.
- On substandard hillside streets, only one hauling truck shall be allowed on the street at any time.
- A minimum of two flag persons are required. One flag person is required at the entrance to the project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the project site in each direction.

- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.
- No person shall perform grading within areas designated "hillside" unless a copy of the permit is in the possession of a responsible person and available at the site for display upon request.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

XVI-40 Safety Hazards

Environmental impacts may result from project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. However, the potential impacts can be mitigated to a less than significant level by the following measure:

- The developer shall install appropriate traffic signs around the site to ensure pedestrian, bicycles, and vehicle safety.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

XVI-50 Inadequate Emergency Access

Environmental impacts may result from project implementation due to inadequate emergency access. However, these impacts can be mitigated to a less than significant level by the following measure:

- The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.

XVI-60 Inadequate Emergency Access (Hillside Streets – Construction Activities)

- No parking shall be permitted on the street during Red Flag Days in compliance with the "Los Angeles Fire Department Red Flag No Parking" program.
- All demolition and construction materials shall be stored on-site and not within the public right-of-way during demolition, hauling, and construction operations.

XVI-80 Pedestrian Safety

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Utilities

XVII-1 In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Minimum irrigation system distribution uniformity of 75 percent

- o Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- o Use of landscape contouring to minimize precipitation runoff

XVII-2 Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

XVII-3 Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

XVII-4 A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.

XVII-5 Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-6 Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.

XVII-7 Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

XVII-8 Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance

CITY OF LOS ANGELES

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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 15 – Joe Buscaino	**DATE:** July 2016
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2016-625-MND	**RELATED CASES:** **DIR-2016-624-CDO-MSC-SPR**	
PREVIOUS ACTIONS CASE NO.	❑ DOES have significant changes from previous actions. ☒ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

The construction of a seven-story, up to 83-foot tall building with 404 apartment units, 5,200 square feet of retail uses, and 641 parking spaces.

ENV PROJECT DESCRIPTION:

Demolition of two commercial buildings and existing surface parking lots and the construction of a seven-story, up to 83-foot tall building with 404 apartment units, 5,200 square feet of retail uses, and 641 parking spaces. The residential building would include 83 studio apartments, 213 one-bedroom apartments, 106 two-bedroom apartments, and 2 three-bedroom apartments on a 2.45 acre site (106,904 square feet). The project would be developed on two parcels. The project would include approximately 385,300 total square feet of building area and approximately 38,947 square feet of open space, including a recreation room, gym, recreation deck and open court, pool and two spas, 6th floor roof terraces, and private balconies. The project site would have access to ground floor retail parking via a driveway from 6th Street. Access to the subterranean residential parking garage would be provided via 5th Street. The following approvals may be included as part of the project: (1) Site Plan Review; (2) Compliance with the San Pedro Community Design Overlay Plan; (3) Adoption of the Initial Study/Mitigated Negative Declaration; (4) Grading/Building Permits; 5) request for a haul route for the export of 100,000 cubic yards of soil; and 6) a Director's Decision to permit up to a 10% reduction in open space.

ENVIRONMENTAL SETTING:

The project site is gently sloping by approximately 10 feet; with the project site elevation rising from east to west, and south to north. The project site is comprised of two parcels, and is located on the east side of Palos Verdes Street, between 5th and 6th Streets. The project site is surrounded by commercial and retail uses, institutional uses, and multi-family residential uses. The Harbor Village Shopping Center and surface parking are located north of the site, across 5th Street. The Port of Los Angeles offices and Port of Los Angeles High School are located to the northwest across 5th Street. A fast food restaurant and hotel are located to the east of the site. A restaurant and commercial uses are located south of the site, across 6th Street. Multi-family residential uses and Marymount University are located directly to the west, across Palos Verdes Street. The project site is one block to the east of the San Pedro Main Channel and ½ block east of John S. Gibson, Jr. Park, across S Harbor Boulevard. The project site is located two blocks from the Los Angeles Port Police Headquarters, which is located at S. Center Street and 3rd Street. Fire Station #112 is located along the San Pedro Main Channel, north of 5th Street and south of the USS Iowa Museum. The project site is located in Fire District No. 1, a Special Grading Area, and in a Liquefaction Zone. Further details regarding the project site and immediate vicinity are found in the Initial Study, as prepared by EcoTierra Consulting, dated July 2016.

PROJECT LOCATION: 550 S Palos Verdes

COMMUNITY PLAN AREA: San Pedro		**AREA PLANNING COMMISSION:**	**CERTFIED NEIGHBORHOOD COUNCIL:**
STATUS: ❑ Preliminary	☒ Does Conform to Plan ❑ Does NOT Conform to Plan	Harbor	Central San Pedro

☐ Proposed ☒ ADOPTED in 1999			
EXISTING ZONING: C2-2-CDO	**MAX DENSITY ZONING:** 1 DU/200 Sq. Ft	**LA River Adjacent:** No	
GENERAL PLAN LAND USE: Regional Commercial	**MAX. DENSITY PLAN:** 534 DU		
	PROJECT DENSITY: 404 DU; 3.6 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	Title	Phone
[signature]	PLANNING ASSISTANT	213-978-1172

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

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

Background

PROPONENT NAME:
Omninet Capital San Pedro, LLC

PHONE NUMBER:
(310) 300-4100

APPLICANT ADDRESS:
9420 Wilshire Boulevard, Fourth Floor
Beverly Hills, CA 90212

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:

PROPOSAL NAME (If Applicable):
550 S. Palos Verdes Mixed-Use 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.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	❑	❑	☒	❑
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	❑	❑	❑	☒
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	❑	☒	❑	❑
d.	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.	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.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	❑	❑	❑	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 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.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
III.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	❑	❑	☒	❑
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	❑	❑	☒	❑
c.	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.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑

IV.	**BIOLOGICAL RESOURCES**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE ?	❑	☒	❑	❑
b.	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.	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.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	☒	❑	❑
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	☒	❑	❑
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	☒	❑
V.	**CULTURAL RESOURCES**				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	❑	❑	☒	❑
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑
e.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE THAT IS LISTED OR DETERMINED ELIGIBLE FOR LISTING ON THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, LISTED ON A LOCAL HISTORICAL REGISTER,OR OTHERWISE DETERMINED BY THE LEAD AGENCY TO BE A TRIBAL CULTURAL RESOURCE	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS**				
a.	EXPOSURE OF 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.	STRONG SEISMIC GROUND SHAKING?	❑	❑	☒	❑
c.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	❑	❑	☒	❑
d.	LANDSLIDES?	❑	❑	☒	❑
e.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	❑	☒	❑	❑
f.	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?	❑	❑	☒	❑
g.	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?	❑	❑	☒	❑
h.	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.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	❑	☒	❑	❑
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	❑	❑	❑	☒

VIII.	**HAZARDS AND HAZARDOUS MATERIALS**				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	❑	❑	☒	❑
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	❑	❑	☒	❑
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	❑	❑	☒	❑
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD 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 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 RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	❑	❑	❑	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	❑	❑	☒	❑
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	❑	☒
IX.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑
b.	SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	❑	❑	☒	❑
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	❑	❑	☒	❑
d.	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.	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.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	❑	❑	☒	❑

g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	❑	☒
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	❑	☒
i.	EXPOSE 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.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	☒	❑
X.	**LAND USE AND PLANNING**				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	❑	☒
b.	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.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES**				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	❑	☒
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	❑	☒
XII.	**NOISE**				
a.	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.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	❑	☒	❑	❑
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	☒	❑	❑
d.	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.	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.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒

c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
XIV.	**PUBLIC SERVICES**				
a.	FIRE PROTECTION?	❑	☒	❑	❑
b.	POLICE PROTECTION?	❑	☒	❑	❑
c.	SCHOOLS?	❑	☒	❑	❑
d.	PARKS?	❑	❑	☒	❑
e.	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/CIRCULATION**				
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	❑	☒	❑	❑
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	❑	❑	☒	❑
c.	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.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	❑	☒	❑
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	❑	❑	☒	❑
f.	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.	**UTILITIES**				
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	☒	❑
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑
c.	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.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	☒	❑	❑
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	❑	❑	☒	❑
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑
XVIII. 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-2008-386-EAF and the associated case(s), CPC-2008-596-GPA-ZC-SPR and Tentative Tract Map No. 72307. 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 Room 621, 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:
MATTHEW LUM	PLANNING ASSISTANT	213-978-1172	9/8/16

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I. INTRODUCTION

1. INTRODUCTION

The subject of this Initial Study (IS) is the proposed 550 S. Palos Verdes Mixed-Use Project (the "proposed project"). The proposed project would construct a 385,300 square foot mixed-use multi-family residential building including 5,200 square feet of retail space, 404 apartment units, 641 parking spaces, and 451 long-and short-term bicycle storage spaces on a 106,905 square foot (2.45 acre) site in the C-2-2-CDO. The project would be six to seven stories high (due to topography of the site) to a maximum height of 83 feet over three subterranean levels of parking and includes one ground level of retail and residential use. The project would provide 38,947 square feet of open space comprised of a recreation room, gym, recreation deck and open court, pool and two spas, 6th floor roof terraces, and private balconies. The project site is currently developed with two commercial buildings and associated surface parking lot that would be demolished. The project site is located in the City of Los Angeles in the San Pedro Community Plan Area. The project applicant is Omninet San Pedro, LLC. A detailed description of the proposed project is contained in Section II (Project Description). The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: 550 S. Palos Verdes Mixed-Use Project

Project Applicant: Omninet San Pedro, LLC, 9420 Wilshire Boulevard, Fourth Floor
Beverly Hills, CA 90212

Project Location: 550 South Palos Verdes Street, Los Angeles, CA 90731

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

3. PURPOSE AND ORGANIZATION OF THE INITIAL STUDY

An Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as Lead Agency to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration must be prepared for a proposed project.

CEQA Guideline 15063 states:

(a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plan described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

(6) The name of the person or persons who prepared or participated in the Initial Study.

(e) Submission of Data. If the project is to be carried out by a private person or private organization, the Lead Agency may require such person or organization to submit data and

information which will enable the Lead Agency to prepare the Initial Study. Any person may submit any information in any form to assist a Lead Agency in preparing an Initial Study.

(f) Format. Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendices G and H. When used together, these forms would meet the requirements for an initial study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an initial study. A previously prepared EIR may also be used as the initial study for a later project.

(g) Consultation. As soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR or a Negative Declaration should be prepared. During or immediately after preparation of an Initial Study for a private project, the Lead Agency may consult with the applicant to determine if the applicant is willing to modify the project to reduce or avoid the significant effects identified in the Initial Study.

4. ORGANIZATION OF THE INITIAL STUDY

This Draft Initial Study is organized into six sections as follows:

Introduction: This Section provides introductory information such as the project title, the Project Applicant, and the designated 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, project objectives, and environmental clearance requirements.

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

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

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.

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

environment. As shown in the following environmental analysis contained in this Initial Study, the implementation of the proposed project could cause some potentially significant impacts on the environment, but these potentially significant impacts would be reduced to less than significant impacts by project revisions in the form of mitigation measures. With regard to some other impacts, the Initial Study shows that no substantial evidence indicates that the proposed project would have significant environmental impacts. Consequently, this Initial Study concludes that an MND shall be prepared for the proposed project.

II. PROJECT DESCRIPTION

1. ENVIRONMENTAL SETTING

A. Project Location

The rectangular, approximately 106,905 square foot (2.45 acre) site is located at 550 South Palos Verdes Street, in the San Pedro Community Plan Area of the City of Los Angeles within Council District 15. The site is located on the east side of Palos Verdes Street, between 5th and 6th Streets.

The site has two existing buildings on the project site, one building at 550 S. Palos Verdes Street (at the intersection of S. Palos Verdes Street and 5th Street) and one building at 164 W 6th Street (at the intersection of S. Palos Verdes Street and 6th Street. The two buildings are separated by a surface parking lot, with additional surface parking located south of 550 S. Palos Verdes (see Figure II-1 [Regional and Project Vicinity Map] and Figure II-2 [Aerial View of the Project Site]). Multi-family residential uses are located directly across S. Palos Verdes Street.

The project site encompasses all of the addresses and assessor parcel numbers (APNs) listed in Table II-1 (Project Site Addresses and Assessor Parcel Numbers).

Table II-1

Project Site Addresses and Assessor Parcel Numbers

Address	APN	Use
550 S. Palos Verdes	7455-026-048	Commercial/Retail and Surface Parking
164 W. 6th Street	7455-026-050	Commercial Offices

Regional access to the project site is provided by the Harbor Freeway (I-110) approximately two miles northwest of the project site. Local access to the project site is provided by S. Gaffey Street, S. Pacific Avenue, or S. Harbor Boulevard.

The project site is served by Metro Local Line 205 and Metro Express 550, which run on S. Harbor Boulevard and 7th Street and by Metro Local Line 246 and Metro Express 450, which run on S. Harbor Boulevard and S. Pacific Avenue. The project site is also served by LADOT DASH lines—Commuter Express 142, which connects with the Metro Blue Line in Long Beach and the San Pedro Dash, which provides local service, on S. Center Street. The Palos Verdes Peninsula Transit Authority runs the GRE, GR, O, and 226 lines from Palos Verdes to San Pedro.

B. Description of Surrounding Area

The project site is located in an urbanized setting and is primarily surrounded by commercial buildings and surface parking lots. Other uses in the surrounding area include commercial and retail uses, institutional uses, and multi-family residential uses. The Harbor Village Shopping Center and surface parking are located north of the site, across 5th Street. The 5-story Port of Los Angeles offices and Port of Los Angeles High School are located to the northwest across 5th Street. A fast food restaurant and hotel are located to the east of the site. A restaurant and commercial uses are located south of the site, across 6th Street. A 16-story multi-family residential building and 12-story Marymount University building are located directly to the west, across Palos Verdes Street.

The project site is one block to the east of the San Pedro Main Channel and ½ block east of John S. Gibson, Jr. Park, across S. Harbor Boulevard. The project site is located two blocks from the Los Angeles Port Police Headquarters, which is located at S. Center Street and 3rd Street. Fire Station #112 is located along the San Pedro Main Channel, north of 5th Street and south of the USS Iowa Museum.

San Pedro Plaza Park is located one block southeast of the project site. San Pedro City Hall and the Los Angeles County Mental Health offices are located on 7th Street. The Los Angeles Fire Department Harbor Museum is located in the San Pedro City Hall and the Los Angeles Maritime Museum is located to the east of the waterfront. The Battleship USS Iowa is docked across S. Harbor Boulevard and is open to the public. The World Cruise Terminal is located to the north of the USS Iowa Museum. Many boat slips line the San Pedro Main Channel. Various photographs of the project site and its immediate surroundings are shown in Figures II-3 through II-8.

Landscaping in the project vicinity is provided by street trees and in the open space and park areas in the project vicinity. The nearest open space areas to the project site is John S. Gibson, Jr. Park, located ½ block to the east on S. Harbor Boulevard; San Pedro Plaza Park, located one block southeast of the project site; and the Anderson Memorial Senior Citizen Center , located approximately two blocks southwest of the project site.

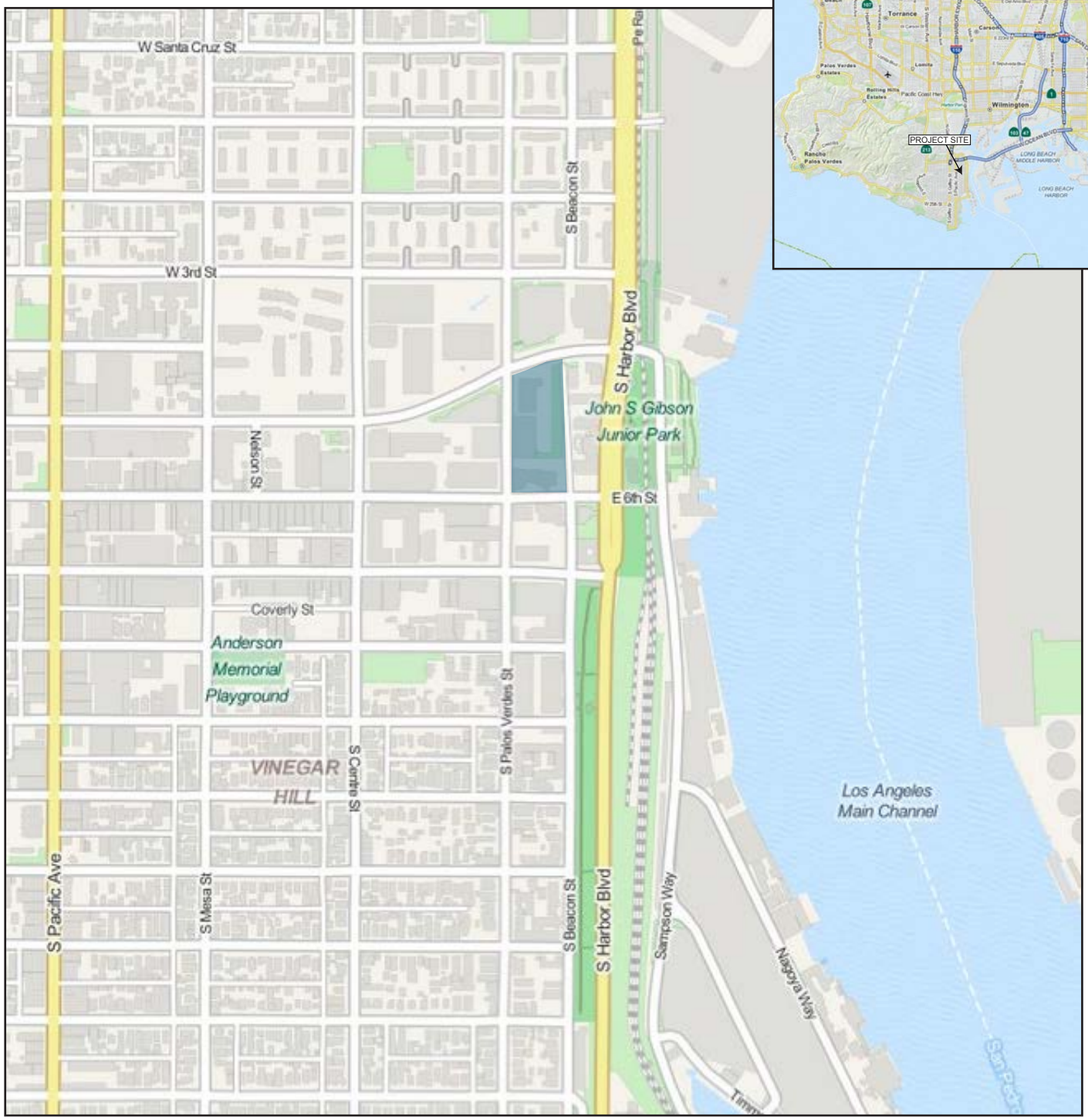
C. Existing Site Zoning / Land Use

As shown in Figure II-2 (Aerial View of the Project Site), the project site encompasses two parcels fronting S. Palos Verdes Street to the west, 6th Street to the south, and 5th Street to the north. The project site is currently developed with a single-story commercial building, a multi-story office building, and associated surface parking lots.

The project site is zoned C2-2-CDO (Commercial, with Downtown San Pedro Community Design Overlay) in the Los Angeles Planning and Zoning Code. The C2-2 is defined as a Commercial zone. The project site is located in Height District 2, which allows unlimited building height, but restricts total floor area to a maximum of six times the buildable area of the project site (Floor Area Ratio (FAR) 6:1).

The project is located in the Harbor State Enterprise Zone Program Area, Beacon Street Redevelopment Project Area San Pedro/Wilmington Revitalization Zone, and the Historic Waterfront District (San Pedro) Business Improvement District. The project site is located within the San Pedro Community Plan area that designates the project site for Regional Center Commercial land uses.

The project is located within Fire District No. 1, a Special Grading Area (BOE Basic Grid Map A-13372), a Liquefaction Zone, within a 500 Foot School Zone (Port of Los Angeles High School), and a 500 Foot Park Zone (John S. Gibson Jr. Park).



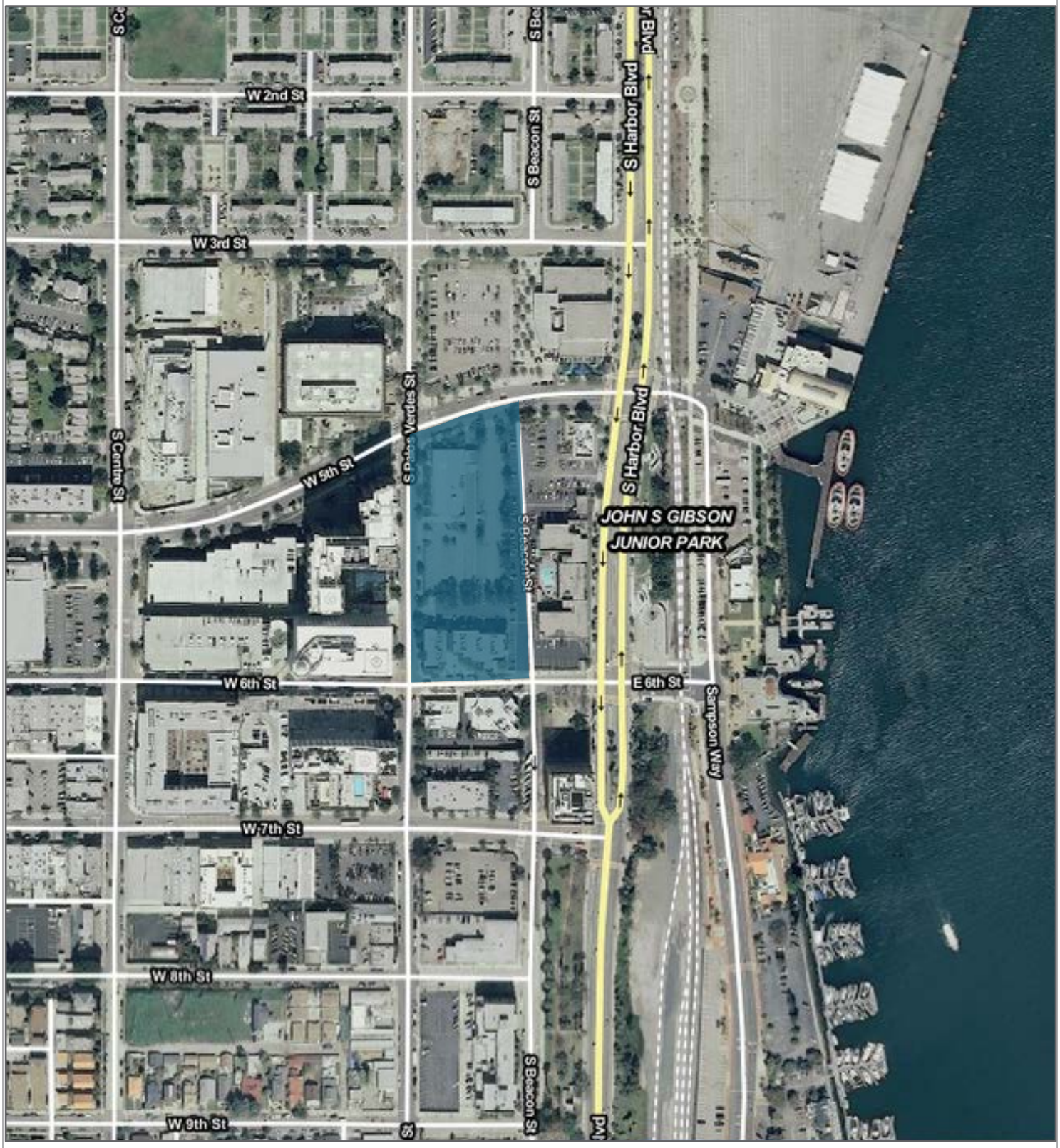
Project Site
Source: Mapquest, April 2015.

0 500
Scale (Feet)

N

EcoTierra consulting

Figure II-1
Regional Vicinity and Project Location



Project Site
Source: MapQuest, May 2015.

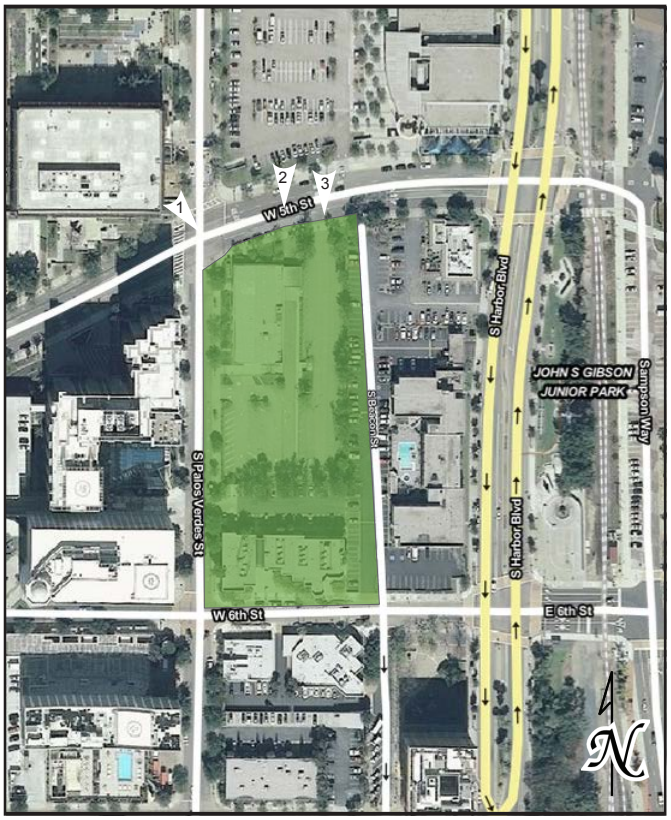
EcoTierra consulting

Figure II-2
Aerial View of the Project Site

View 1: View of the northwest portion of the project site.

View 2: View from West 5th Street at the northern portion of the project site.

View 3: View from West 5th Street at the northern portion of the project site.



PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

EcoTierra consulting

Figure II-3
Views of the Project Site, Views 1, 2, and 3

View 4: View of the northeast portion of the project site.

View 5: View of the southern portion of the project site.

View 6: View of the northwest portion of the project site.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

EcoTierra consulting

Figure II-4
Views of the Project Site, Views 4, 5, and 6

View 7: View from West 6th Street of the southern portion of the project site.

View 8: View from South Palos Verdes Street of the southern portion of the project site.

View 9: View from South Palos Verdes Street of the southern portion of the project site.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

View 1: View from the northwest corner of West 5th Street and South Palos Verdes Street of a multi-family use.

View 2: View from South Palos Verdes Street of a commercial use.

View 3: View from the northeast corner of West 5th Street and South Harbor Boulevard of a commericial use.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

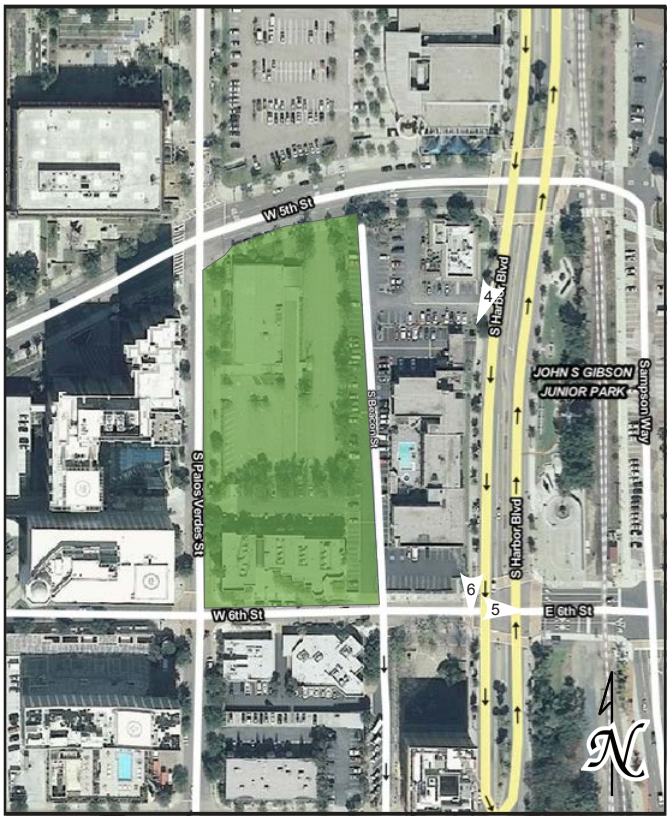
EcoTierra consulting

Figure II-6
Views of Surrounding Uses, Views 1, 2, and 3

View 4: View from South Harbor Boulevard of a Hotel use.

View 5: View from West 6th Street at the Los Angeles Maritime Museum.

View 6: View from West 6th Street at a commercial use.



PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

EcoTierra consulting

Figure II-7
Views of Surrounding Uses, Views 4, 5, and 6

View 7: View from the northwest corner of West 6th Street and South Palos Verdes Street of a commercial use.

View 8: View from the southeast corner of West 6th Street and South Palos Verdes Street of a commercial use.

View 9: View looking west on West 6th Street.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra Consulting, May 2015.

EcoTierra consulting

Figure II-8
Views of Surrounding Uses, Views 7, 8, and 9

2. PROJECT CHARACTERISTICS

As shown in Figures II-9 thru II-20, the proposed project involves the demolition of two existing buildings and surface parking lots and the construction of a seven-story, up to approximately 83-foot tall mixed-use and residential building, which would include 404 residential units and 641 parking spaces (see Table II-2 (Project Development Summary)). The residential building would include approximately 385,300 total square feet of floor area, including approximately 38,947 square feet of open space.

Table II-2
Project Development Summary

Size	Total (Units)
Retail/Restaurant	
Ground Level Retail	*5,200*
	5,200
Residential Units	
Studio	*83*
1-Bedroom	*213*
2-Bedroom	106
3-Bedroom	2
Total Units	**404**
Parking Spaces	
Residential	*620*
Retail	*21*
Total Parking Spaces	**641**
Bicycle Storage (Residential)	*445*
Bicycle Storage (Retail)	*6*
Total Bicycle Storage	***451***
Open Space	
Recreation Room	*1,059*
Gym	*600*
Recreation Deck and Open Court	*20,050*
6th Floor Roof Terraces	*2,188*
Private Patios/Balconies	*15,050*
Total Open Space	***38,947***
Source: Nadel Architects, April 2016.	

The project proposes to provide 620 parking spaces for building residents and 21 parking spaces for retail uses within three subterranean levels for a total of 641 parking spaces. Based on the proposed unit mix, the project would require a total of 639 parking spaces per the Los Angeles Municipal Code.

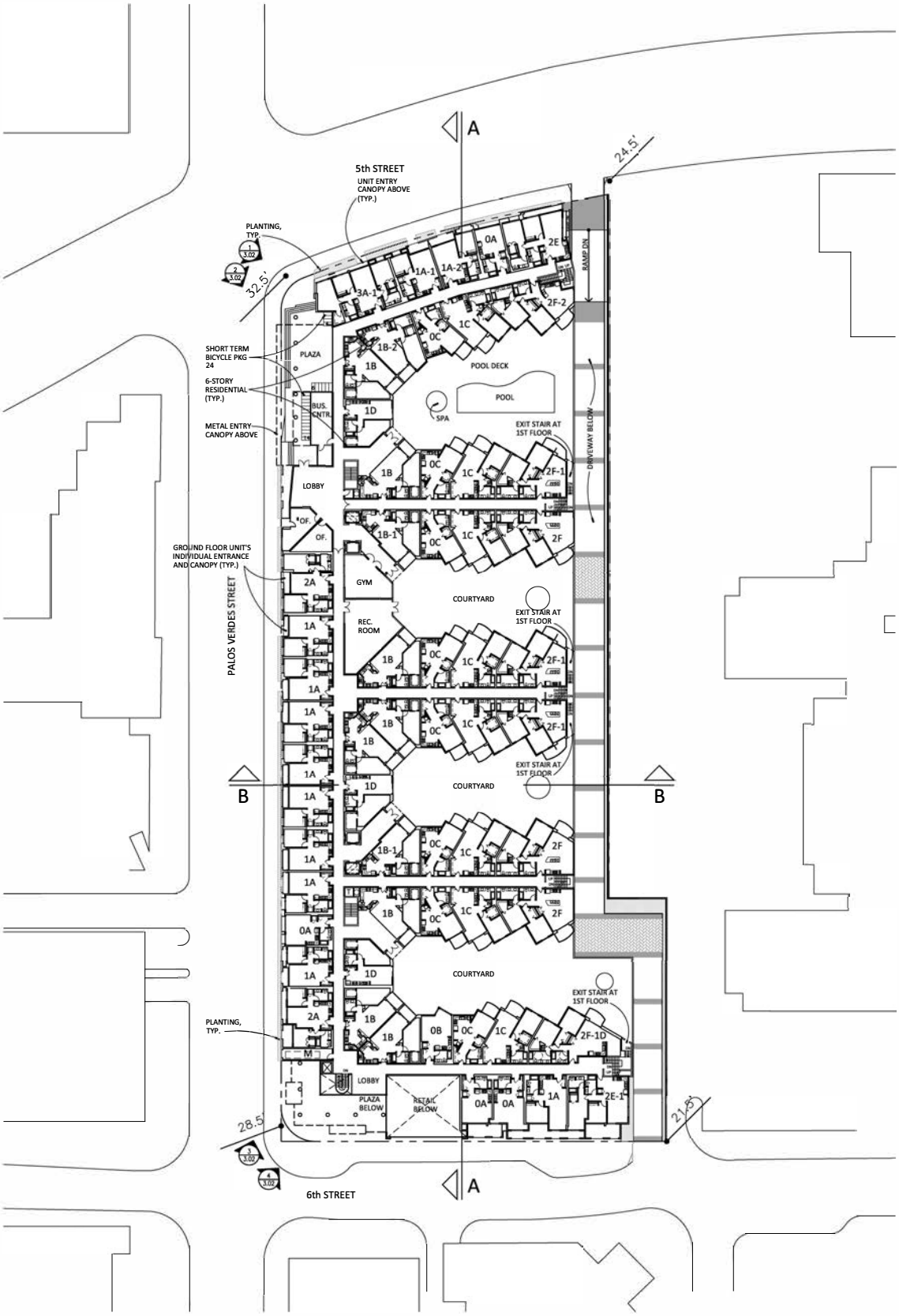
Access to ground floor retail parking would be via a driveway from 6th Street. Access to the subterranean residential parking garage would be provided via 5th Street. There would be no access to the project site from S. Palos Verdes Street.

A. Project Construction

Construction of the proposed project is anticipated to begin in approximately 2016 and would take place over a period of approximately over 19 months; including approximately three months for surface parking lot removal and underground excavation, approximately three months for the concrete garage, approximately five months for the framing, and approximately seven months for the finishes.

B. Project Land Use / Zoning

As previously noted, the project site is currently developed with commercial uses and associated surface parking lot. The project site is currently zoned C2-2-CDO, which allows for the proposed multi-family residential and retail uses. The project site is located in Height District 2, which typically permits a maximum floor area ratio (FAR) of 6:1 with no limitation on building height. The proposed project would have an FAR of approximately 3.6.

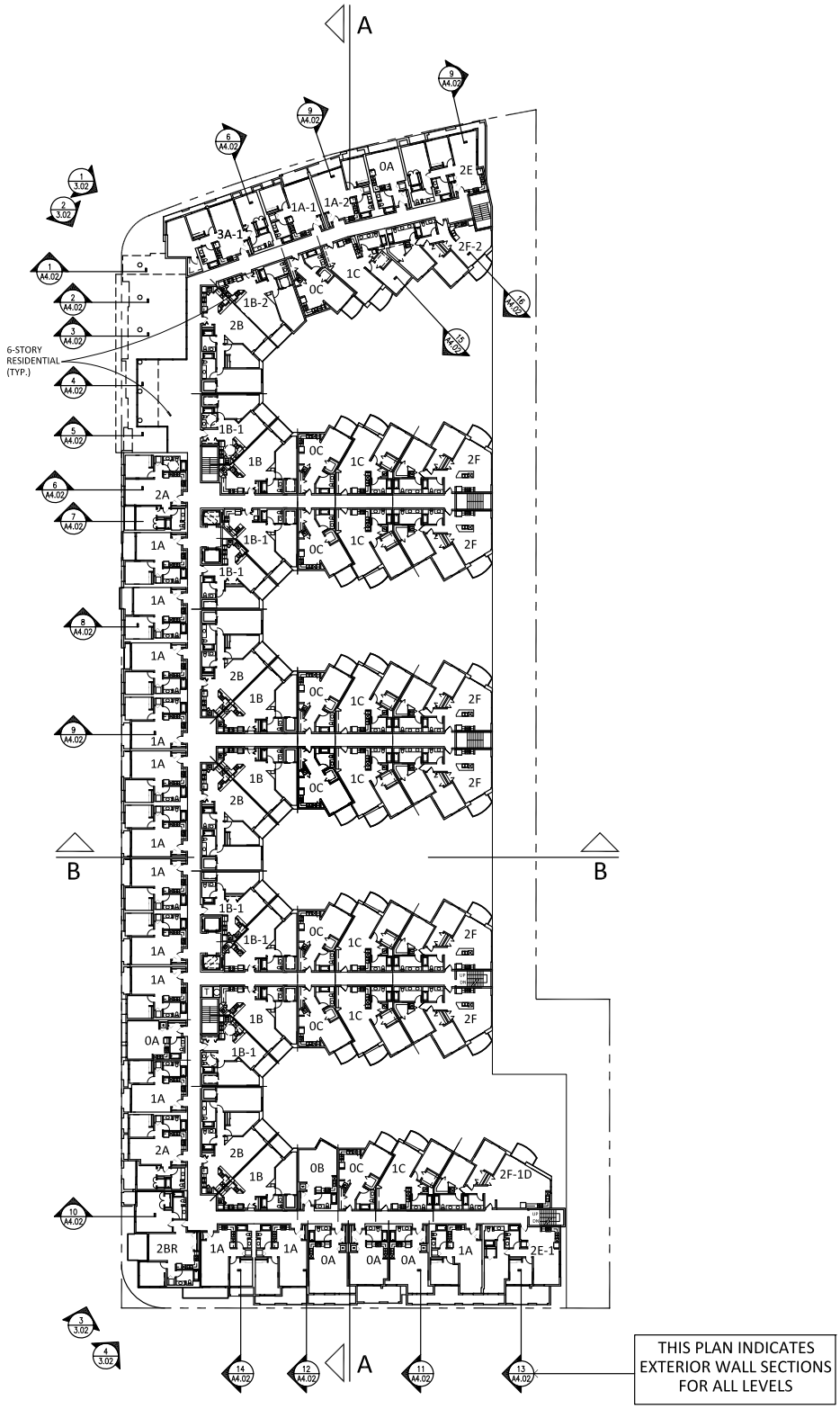


Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

Figure II-9
1st/Ground Floor Plan

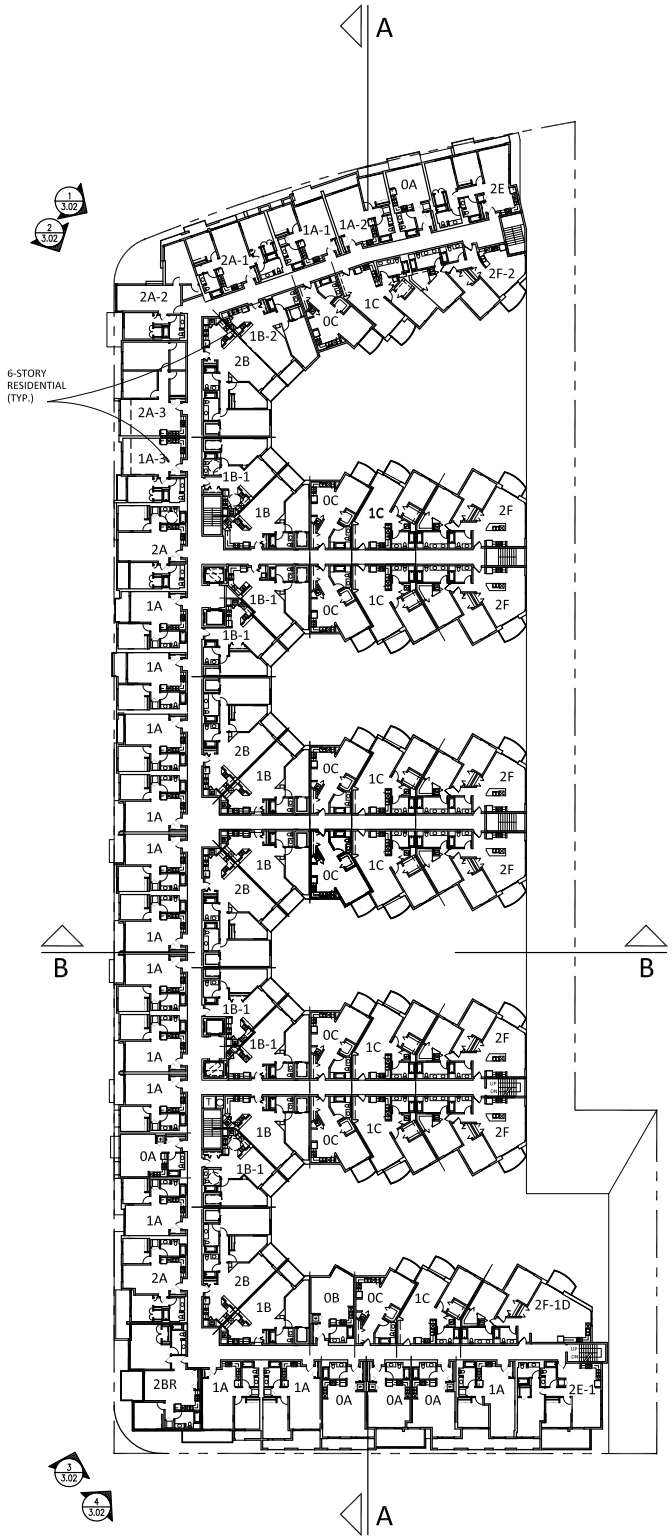


Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

Figure II-10
2nd Floor Plan

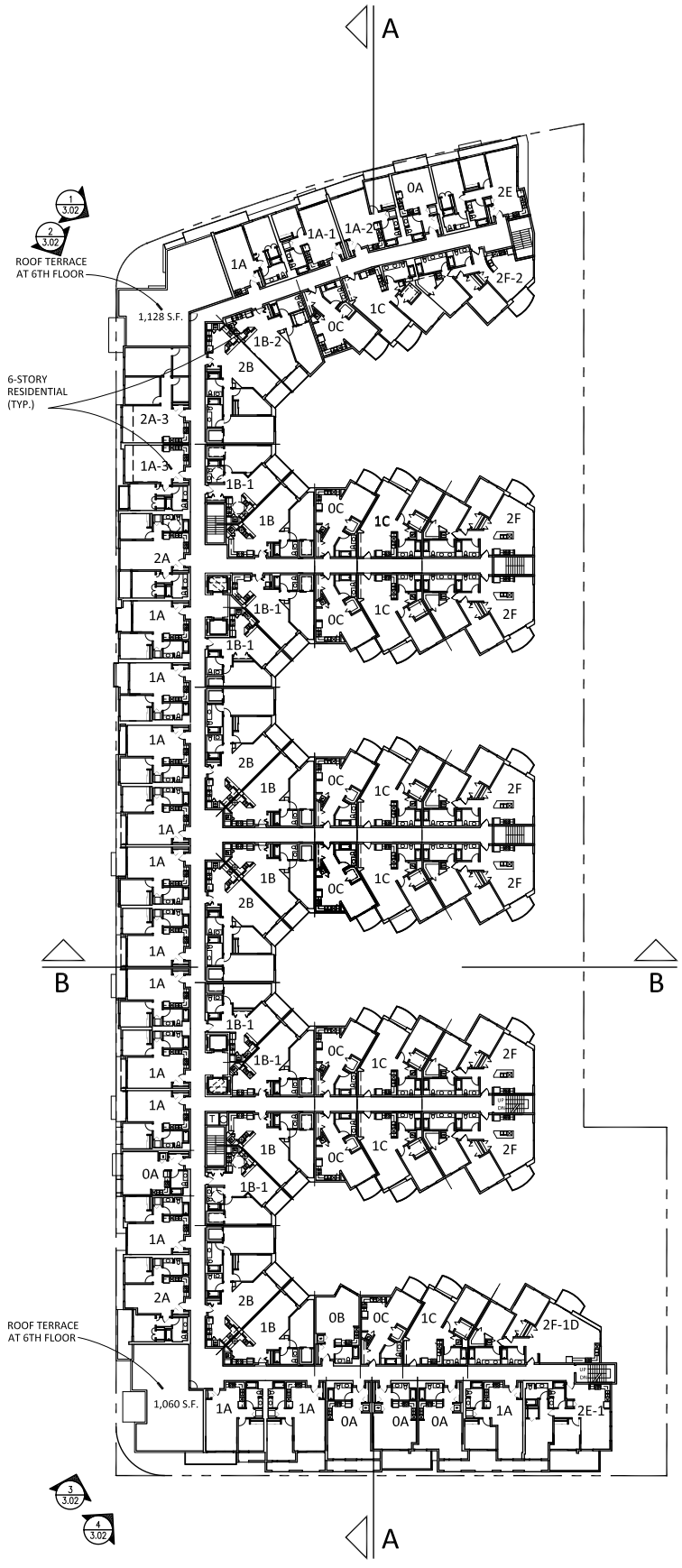


Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

Figure II-11
3rd through 5th Floor Plan

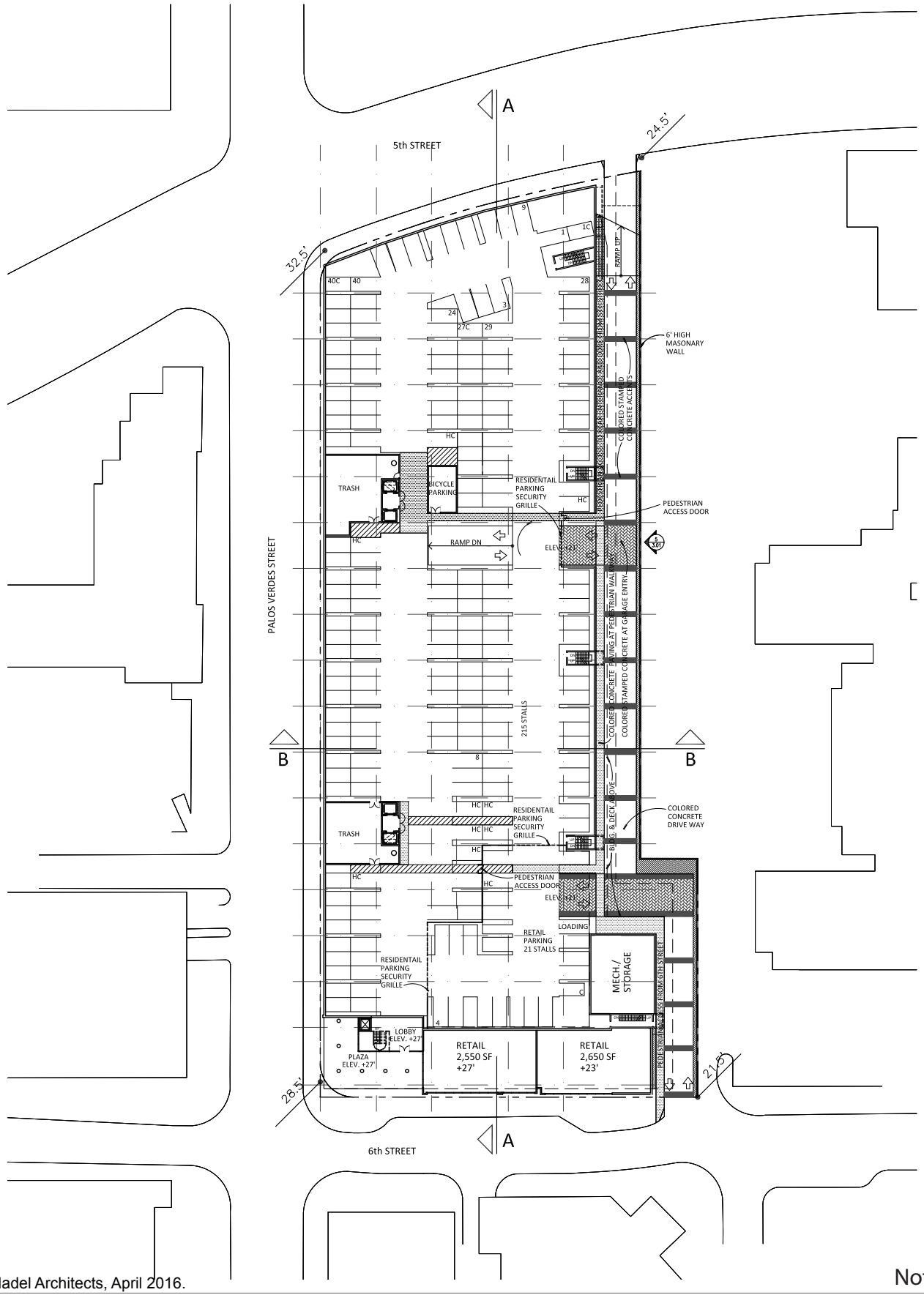


Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

Figure II-12
6th Floor Plan

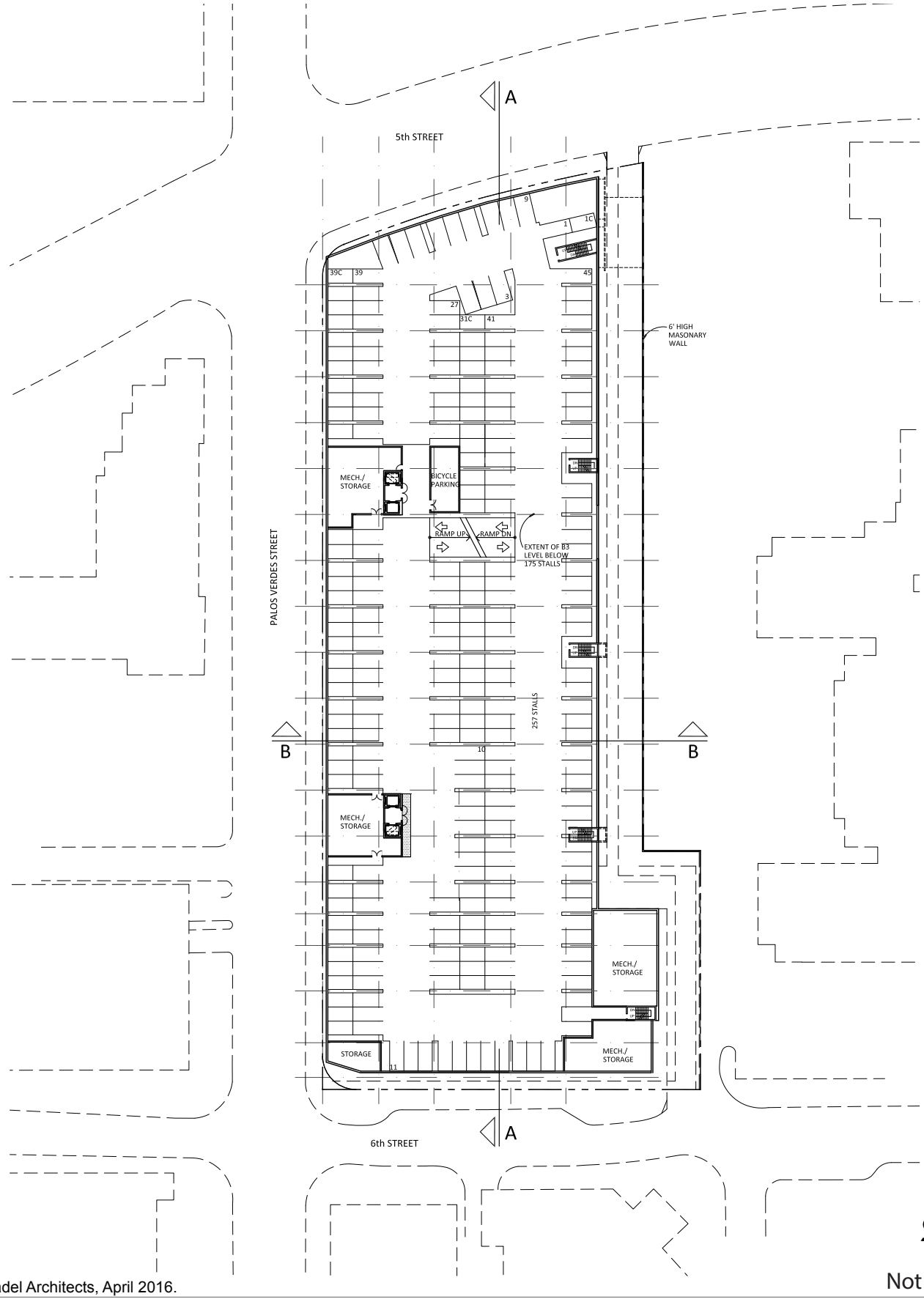


Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

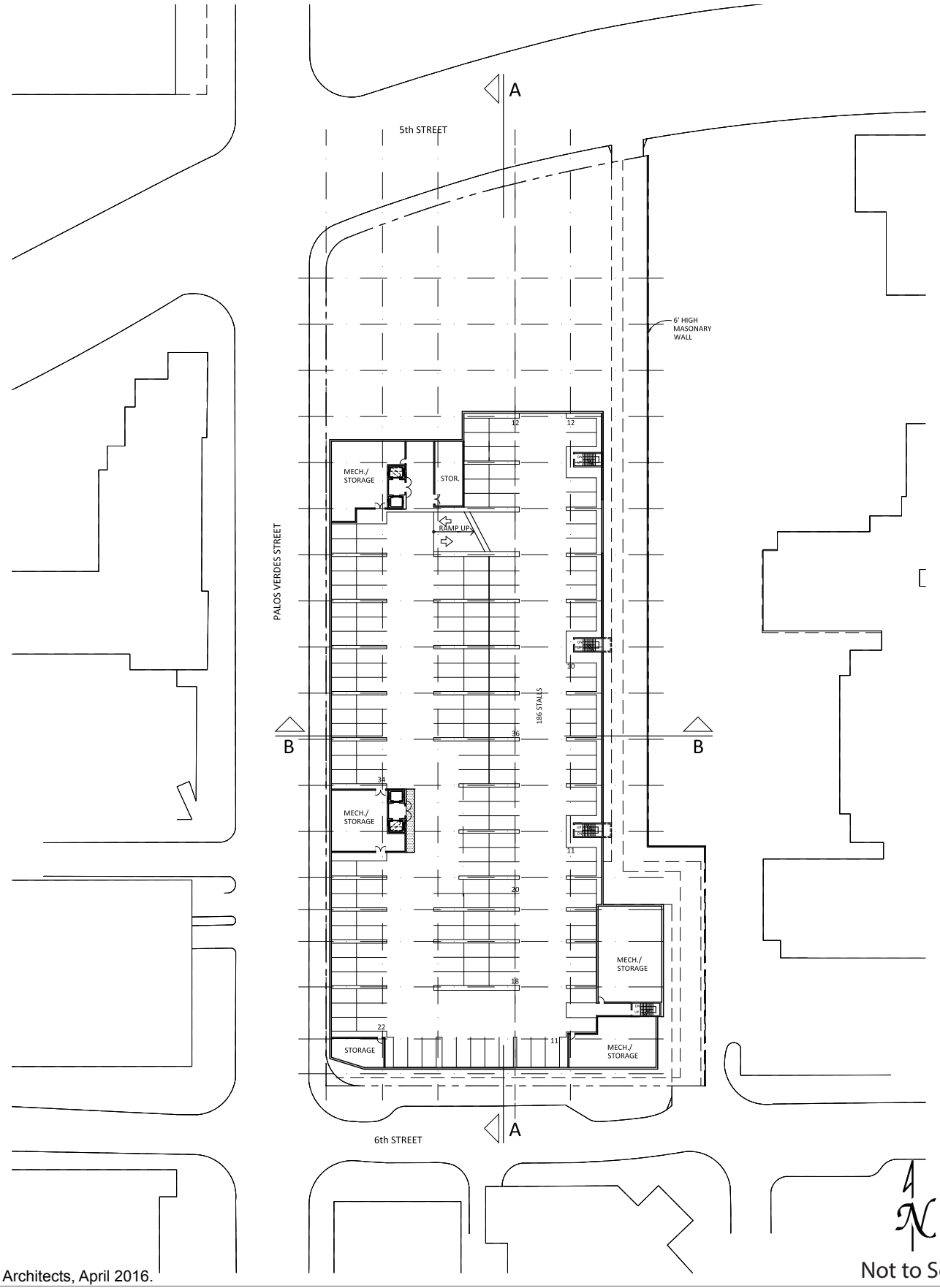
Figure II-13
B1 Parking Plan



Source: Nadel Architects, April 2016.

EcoTierra consulting

Figure II-14
B2 Parking Plan



Source: Nadel Architects, April 2016.

Not to Scale

EcoTierra consulting

Figure II-15
B3 Parking Plan

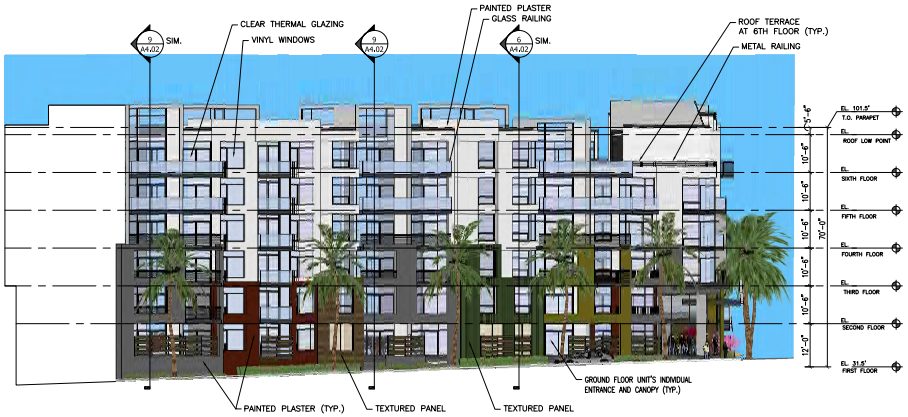
1 EAST ELEVATION-ALLEY

2 WEST ELEVATION-PALOS VERDES STREET

Source: Nadel Architects, April 2016.

EcoTierra consulting

Figure II-16
East and West Project Elevations



4 — *NORTH ELEVATION-5TH STREET*

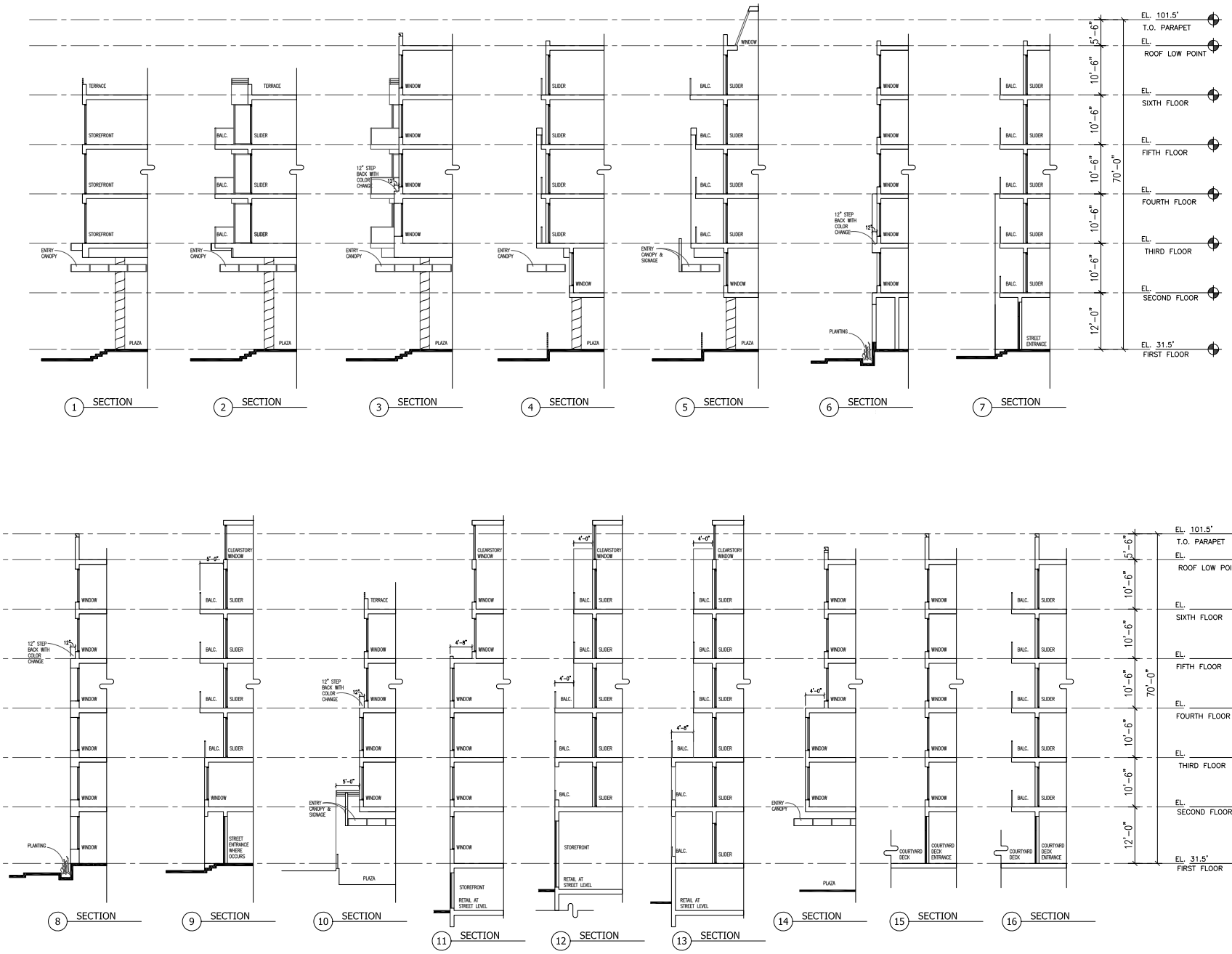
3 — *SOUTH ELEVATION-SIXTH STREET*

Source: Nadel Architects, April 2016.

Source: Nadel Architects, April 2016.

EcoTierra consulting

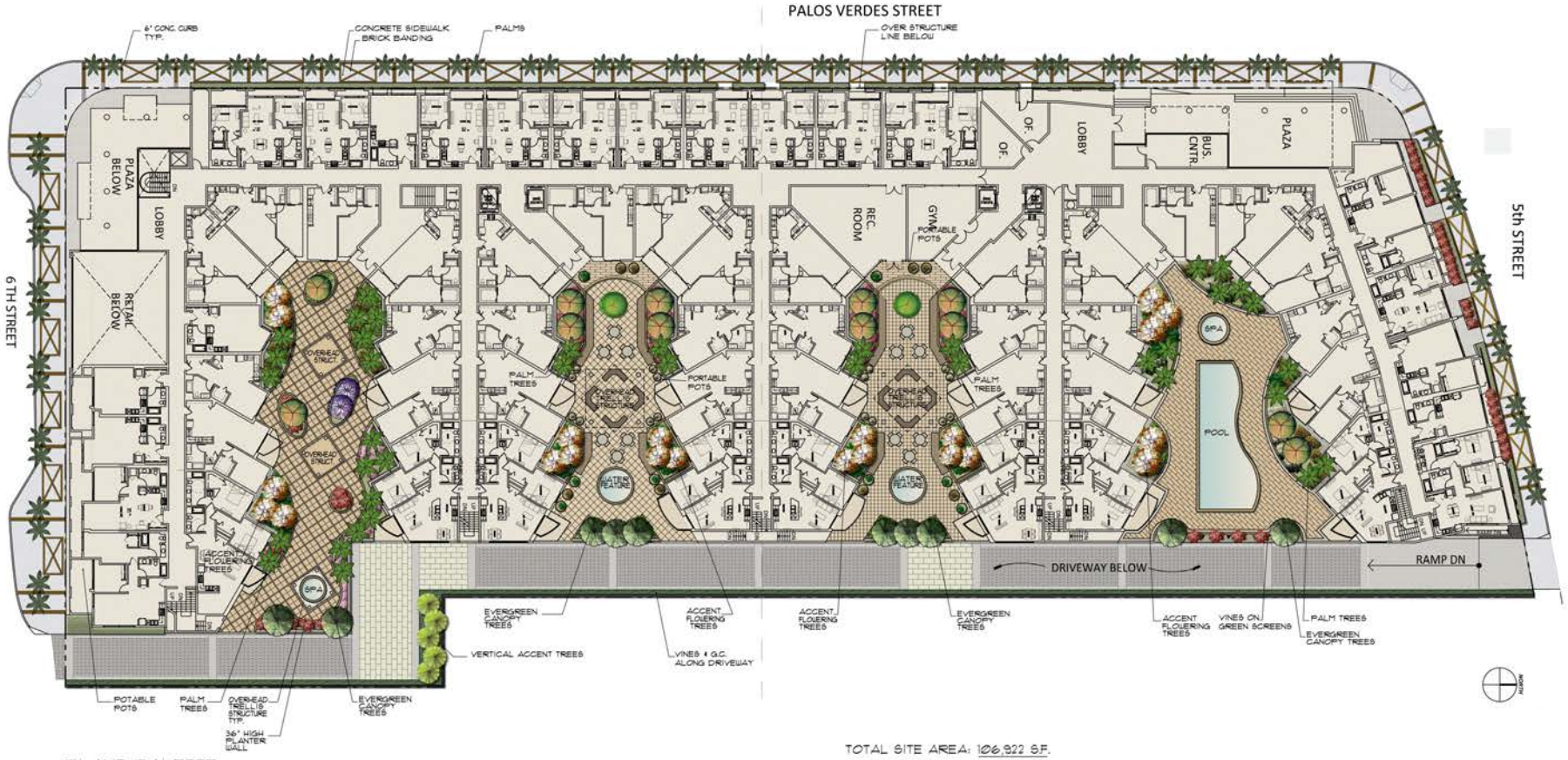
Figure II-18
East and South Sections



Source: Nadel Architects, April 2016.

EcoTierra consulting

Figure II-19
Project Sections



PLANT PALETTE

PALMS (MIN. 12' TRUNK HEIGHT) — 12' BROWN TRUNK IS LARGER THAN 48" BOX SIZE PALM.
- PHOENIX CANARIENSIS - CANARY ISLAND DATE PALM
- COCOS PLUMOSA - QUEEN PALM
- WASHINGTONIA ROBUSTA - MEXICAN FAN PALM
- PHOENIX RECLINATA - SENEGAL DATE PALM

CANOPY SHADE TREES (MIN. 24" BOX)
- CINNAMOMUM CAMPHORA - CAMPHOR TREE
- MAGNOLIA GRANDIFLORA - SOUTHERN MAGNOLIA
- CUPANIOPSIS ANACARDIOIDES - CARROTWOOD
- QUERCUS ILEX - HOLLY OAK

VERTICAL ACCENT TREES (MIN. 24" BOX)
- GINKO BILOBA - MAIDENHAIR TREE
- MELALEUCA LEUCADENDRA - CAJEPUT TREE
- LIQUIDAMBAR STYRACIFLUA 'PALO ALTO' - SWEET GUM
- BRACHYCHITON POPULNEUS - BOTTLE TREE
- CUPRESSOCYPARIS LEYLANDII - LEYLAND CYPRESS
- TRISTANIA CONFERTA - BRISBANE BOX
- EUCALYPTUS SIDEROXYLAN 'ROSEA' - RED IRON BARK
- PINUS CANARIENSIS - CANARY ISLAND PINE

ACCENT FLOWERING TREE (MIN. 24" BOX)
- PRUNUS CERASIFERA 'ATROPURPUREA' - FLOWERING PLUM
- METROSIDEROS EXCELSUS - NEW ZEALAND CHRISTMAS TREE
- PYRUS CALLERYANA 'BRADFORDDI' - BRADFORD PEAR

ACCENT TREES (MIN. 24" BOX)
- CERCIDIUM PRAECOX - SONORAN PALO VERDE
- TABEBUIA CHRYSOTRICHA - GOLDEN TRUMPET TREE
- JACARANDA MIMOSIFOLIA - JACARANDA
- CHORISIA SPECIOSA - FLOSS SILK TREE

SHRUBS & GROUNDCOVER (MIN. 5 GAL.)
- PHORMIUM TENAX - NEW ZEALAND FLAX
- ESCALLONIA FRADESII - ESCALLONIA
- GREVILLEA OCCIDENTALIS - LAVENDER STAR FLOWER
- STRELITZIA REGINAE - BIRD OF PARADISE
- LEPTOSPERMUM SCOPARIUM 'RUBY GLOW'
- PHOTINIA FRASERI - PHOTINIA
- DIETES BICOLOR - YELLOW BUTTERFLY IRIS
- LANTANA MONTEVIDENSIS - TRAILING LANTANA
- RAPHIOLEPIS INDICA - INDIA HAWTHORN
- ARCTOSTAPHYLOS 'EMERALD CARPET'
- HEMEROCALLIS HYBRID - DAYLILY
- PENSTEMON BETACEUM 'RUBRUM' - FOUNTAIN GRASS

PLANT QUANTITY

PALMS	100
TREES	88
SHRUBS & VINES	2000

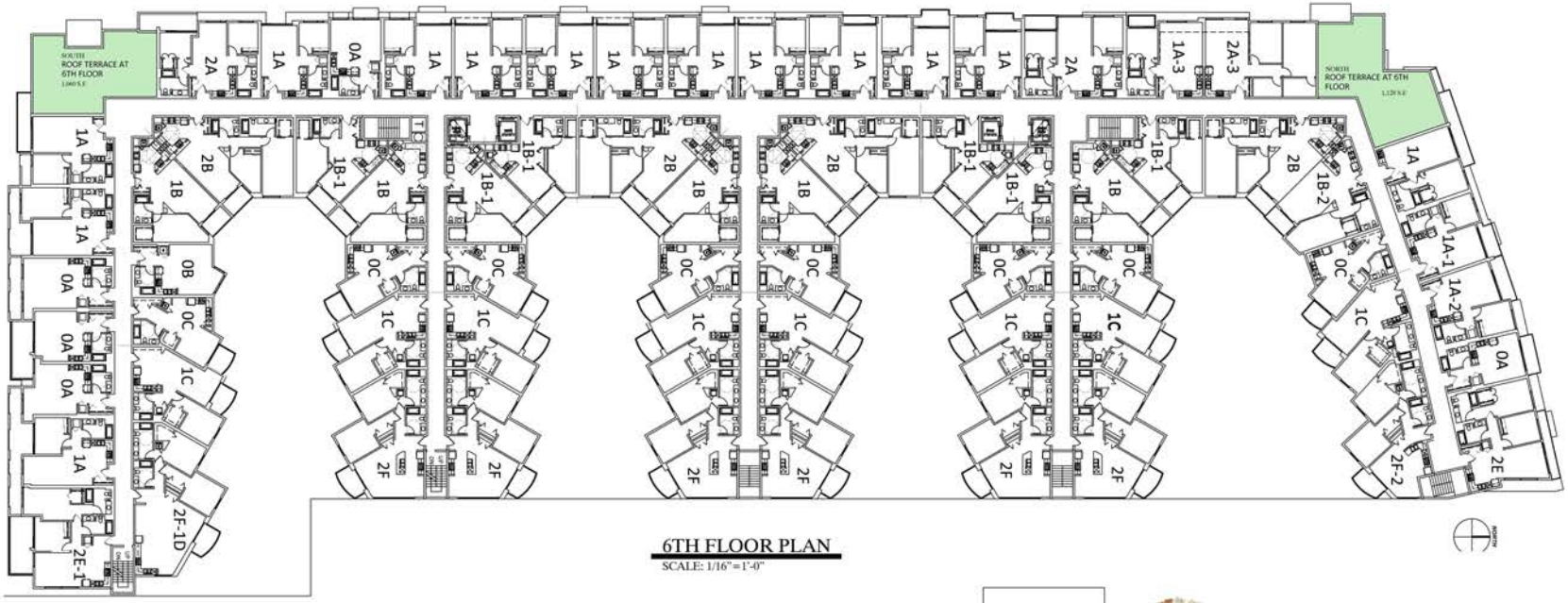
TOTAL SITE AREA: 106,922 S.F.
BUILDING FOOTPRINT: ± 91843 S.F.
DRIVEWAY PAVING: 12,264 S.F.
CORNER OF 6TH & PALOS VERDES PLANTING: 915 S.F.
DRIVEWAY SIDE WALL PLANTING: 1,800 S.F.

OPEN COURT AREA: 20,050 S.F. 19.5% OF THE SITE

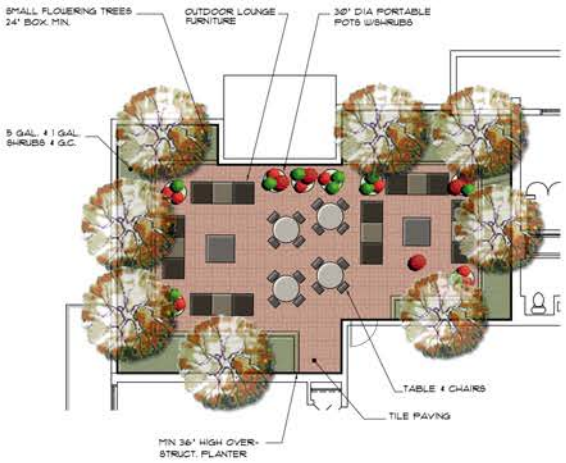
OPEN COURTYARDS	PLANTING	PAVING	TOTAL SQUARE FOOTAGE
COURT A	1,967 S.F.	3,877 S.F.	6,075 S.F.
COURT B	1,435 S.F.	2,764 S.F.	4,430 S.F.
COURT C	1,433 S.F.	2,993 S.F.	4,426 S.F.
COURT D	1,978 S.F.	3,603 S.F.	5,813 S.F.
TOTAL	6,813 S.F.	13,237 S.F.	20,050 S.F.

LANDSCAPE AREA: 106,922 - 91843 = 14,979 S.F.
LANDSCAPE AREA- COURTYARDS: 14,979 + 20,050 = 35,029 S.F. 33% OF THE SITE
SOFTSCAPE AREA: 6,813 + 915 + 1,800 = 9,528 S.F. = 9% OF TOTAL SITE
HARSCAPE AREA: 13,237 + 12,264 = 25,501 S.F. = 24% OF TOTAL SITE

Source: Nadel Architects, April 2016.

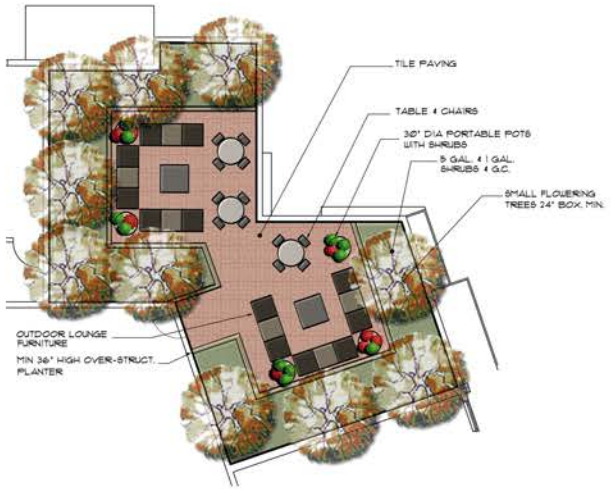


6TH FLOOR PLAN
SCALE: 1/16" = 1'-0"



TOTAL SQUARE FOOTAGE OF SOUTH ROOF TERRACE: 1,060 S.F.
SQUARE FOOTAGE OF PLANTING: 420 S.F.
SQUARE FOOTAGE OF HARDSCAPE: 640 S.F.
420 : 1060 x 100 = 40 40% OF S. TERRACE IS PLANTING

SOUTH ROOF TERRACE ENLARGEMENT
SCALE: 3/16" = 1'-0"



TOTAL SQUARE FOOTAGE OF NORTH ROOF TERRACE: 1,128 S.F.
SQUARE FOOTAGE OF PLANTING: 630 S.F.
SQUARE FOOTAGE OF HARDSCAPE: 498 S.F.
630 : 1128 x 100 = 55 55% OF N. TERRACE IS PLANTING

NORTH ROOF TERRACE ENLARGEMENT
SCALE: 3/16" = 1'-0"

Source: Nadel Architects, April 2016.

EcoTierra consulting

Figure II-21
Roof Terrace Plan

3. PROJECT OBJECTIVES

The objectives of the proposed project are as follows:

- To establish infill development providing housing on-site to serve the local community in a manner consistent with the City of Los Angeles General Plan, the San Pedro Community Plan, and the Downtown San Pedro Community Design Overlay;
- To provide a well-designed development that is compatible and complementary with surrounding land uses;
- To provide adequate parking facilities to serve the proposed development residents and guests; and
- To mitigate the potential environmental impacts of the proposed project.

4. ACTIONS REQUIRED

The City of Los Angeles Planning Department is the lead agency for the proposed project. In order to permit development of the proposed project, the City may require approval of one or more of the following discretionary actions:

- Compliance with the Downtown San Pedro Community Design Overlay;
- Director's Decision to permit up to a 10% reduction in open space;
- Site Plan Review; and
- Adoption of the Initial Study/Mitigated Negative Declaration.

In addition, pursuant to various sections of Los Angeles Municipal Code, the proposed project will require ministerial approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: permits for driveway curb cuts, storm water discharge permits, grading permits, installation and hookup approvals for public utilities, haul route approvals, and related permits.

5. RELATED PROJECTS

Section 15063(b) of the State CEQA Guidelines provides that Initial Studies consider the environmental effects of a Proposed Project individually as well as cumulatively. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts.

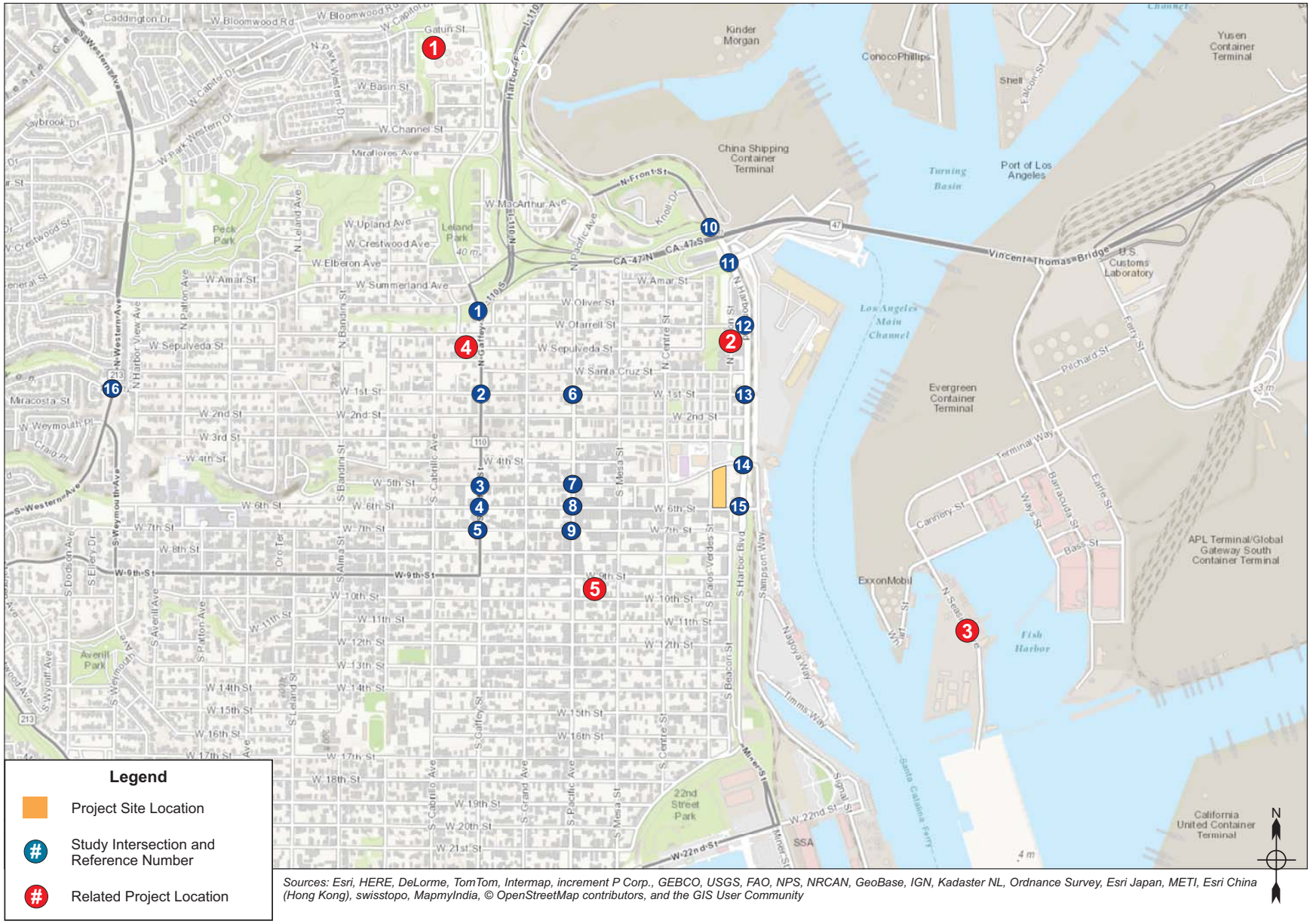
All projects recently approved, under construction, or to be developed in the reasonably foreseeable future (i.e., those projects with pending applications) that could potentially produce a related cumulative environmental impact, when considered in combination with the proposed project are evaluated throughout Section IV, Environmental Impact Analysis. In addition to the use of the ambient growth rate, listings of potential related projects in the study area that might be developed within the study time frame

were obtained from LADOT, Los Angeles Unified School District (LAUSD) and recent studies of projects in the area. A review of this information indicated that a total of 5 related projects within an approximate 1.5-mile radius of the project site that are considered in the cumulative impact analyses in this Initial Study. Table II-3 (List of Related Projects) lists the 5 related projects. The locations of these related projects are shown in Figure II-21 (Related Projects Location Map).

Table II-3
List of Related Projects

No.	Proposed Land Use	Size	Location
1	Condominiums	135 DU	1363 N Gaffey Street
2	Condominium	94 DU	319 N Harbor Boulevard
3	Dry Dock Facility	7 acres	1046 Seaside Avenue
4	Gas Station 24-Hour Mini-Mart	12 pumps 1,390 sf	305 N Gaffey Street
5	Charter High School*	450 Students	461 W 9th Street

DU = dwelling unit sf = square feet
**School opened in 2014 with 150 students. The total maximum number of students would 600.*
Source: KOA Corporation, May 2015.



Source: KOA Corporation, May 2015.

EcoTierra consulting

Figure II-22
Related Projects

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on the CEQA Guidelines Appendix G Environmental Checklist Form and the City of Los Angeles *L.A. CEQA Thresholds Guide 2006.*[1]

IMPACT ANALYSIS

1. AESTHETICS

Existing Conditions

The following is a summary of existing conditions with respect to aesthetics within the project vicinity.

Visual Character

The project site is located in an urbanized setting and is primarily surrounded by commercial and institutional buildings and surface parking lots. Other uses in the surrounding area include commercial and retail uses, institutional uses, and multi-family residential uses. The Harbor Village Shopping Center and surface parking are located north of the site, across 5th Street. The five-story Port of Los Angeles offices and Port of Los Angeles High School are located to the northwest across 5th Street. A fast food restaurant and hotel are located to the east of the site. A restaurant and commercial uses are located south of the site, across 6th Street. A 16-story multi-family residential building and 12-story Marymount University building are located directly to the west, across S. Palos Verdes Street. Various photographs of the project site and its immediate surroundings are shown in Figures II-3 through II-8.

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[1] *In 2010, the CEQA Guidelines were revised to include greenhouse gas emissions, forestry resources, and changes to transportation/traffic. As directed by SB97, the Natural Resources Agency adopted Amendments to the CEQA Guidelines for greenhouse gas emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. These amendments became effective on March 18, 2010, website: http://ceres.ca.gov/ceqa/guidelines/. Although the City of Los Angeles has updated the checklist to reflect the Guidelines changes, the CEQA Thresholds Guide, which was developed prior to the changes, has not been updated.*

The project site is located within the San Pedro Community Plan area of the City of Los Angeles. The project site area is located in an area designated for Regional Center land uses. The project site is zoned C2-2, which is defined as a Multiple Dwelling Zone. The C2-2 height designation "2" restricts total floor area to a maximum of six times the buildable area of the project site (Floor Area Ratio (FAR) 6:1). The project site is presently developed with commercial buildings and surface parking lots.

Views of and through the Project Site

The project site is not located within or along a scenic corridor as designated in the San Pedro Community Plan or San Pedro Local Coastal Program Specific Plan. Due to the location of the project site and the surrounding development, there are minimal views through the project site of the Vincent Thomas Bridge and Port of Los Angeles loading cranes. Due to the presence of intervening buildings, there are no expansive views to scenic or visual resources to the west.

The closest officially designated state scenic highway is approximately 30 miles north of the project site (State Route 2, from approximately 3 miles north of Interstate 210 in La Cañada to the San Bernardino County line). The nearest City of Los Angeles designated scenic highway to the project site is Harbor Boulevard, approximately one block east of the project site.[2] Although the proposed project would be visible from Harbor Boulevard, scenic vistas and viewsheds of this scenic highway are oriented towards the San Pedro Main Channel, the ocean, and Santa Catalina Island.

Architectural and Urban Design

There is a wide variety of building types and architectural styles in the vicinity. Building heights in the area range from 1-story buildings to buildings of 12- and 16-stories in the immediate vicinity of the project site across S. Palos Verdes Street. Another 12-story residential building is located on S. Palos Verdes Street, south of 7th Street. Other buildings in the area range from two- to five-stories in height. These buildings exhibit a range of architectural styles from older brick commercial buildings, the multi-storied 1928 San Pedro City Hall, to modern multi-storied buildings.

Lighting

The project site is located in a well-lit, urban area where there is ambient nighttime lighting including street lighting, lighting from the Port of Los Angeles berths, architectural and security lighting, indoor

[2] *California Scenic Highway Mapping System, State of California Department of Transportation, website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.*

building illumination (light emanating from the interior of structures which passes through windows), and vehicle headlights.

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views 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). Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

There are no eligible or designated state scenic highways in the project vicinity. The nearest City of Los Angeles designated scenic highway to the project site is Harbor Boulevard, approximately one block east of the project site.[3] Although the proposed project would be visible from Harbor Boulevard, due to the topography, scenic vistas and viewsheds of this scenic highway are oriented to the south and east towards the San Pedro Main Channel, the ocean, and Santa Catalina Island. Views to the north and west include areas developed with buildings and the project would not represent a significant change in these views. There would be no impacts to city-designated scenic highways as a result of the buildout of the proposed project.

There are no significant natural features (such as trees, rock outcroppings, bodies of water, or substantial stands of native vegetation) found on the project site. In addition, there are no major open spaces found on the project site and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the project site. There are no protected trees as

[3] *California Scenic Highway Mapping System, State of California Department of Transportation, website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.*

defined by the City of Los Angeles Protected Tree Ordinance No. 177,404 (i.e., native oaks [*Quercus sp*.], western sycamore [*Platanus racemosa*], Southern California black walnut [*Juglans californica*] and California bay *[Umbellularia californica*]) on the project site.

The only vegetation on the project site consists of the ornamental trees and shrubbery planted along the north, west, and east frontages of the buildings, in the parking areas, and along the eastern edge of the parking lot. Trees on the project site would be removed; however, the proposed project includes landscaping, which would include various shrubs, ground cover plants, and trees. Thus the removal and replanting of landscaping would not degrade the visual qualities of the project site and surrounding area. New landscaping would be provided as part of the project. Impacts to on-site scenic resources would be less than significant.

Under the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact occurs only when the proposed project adversely affects the public view of a scenic vista, and therefore, impacts to private views are not considered to be significant under the *Thresholds Guide*. However, the project would be visible from the 16-story residential building on the west side of S. Palos Verdes Street. Existing buildings on the project site are one- to two-stories in height. The project would change some views from the existing residential building. However, land uses in the project area are zoned for Height District 2. Therefore, the City has anticipated a gradual change in views on existing development as properties are redeveloped with taller buildings; therefore, impacts to private views would be less than significant.

The project site does not contain any unique scenic vistas, as it is entirely comprised of commercial buildings and surface parking lot uses. No visual resources are located in the vicinity of the project site with the potential to be considered scenic resources. Therefore, impacts to scenic vistas would be less than significant.

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

No Impact. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur only if scenic resources would be damaged and/or removed by development of a project.

There are no scenic resources, such as native California trees or rock outcroppings on the project site. The closest officially designated state scenic highway is approximately 30 miles north of the project site (State Route 2, from approximately 3 miles north of Interstate 210 in La Cañada to the San Bernardino County line). The nearest City of Los Angeles designated scenic highway to the project site is along Harbor

Boulevard, approximately one block east of the project site.[4] However, the proposed project is not located along or within the scenic vistas or viewsheds of this scenic highway. Therefore, 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?

Potentially Significant Unless Mitigation Incorporated. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if a project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

General Character of the Project Site and Surrounding Area

The project site is located within the San Pedro Community Plan area. The San Pedro Community Plan area is characterized by commercial districts and residential neighborhoods with a mix of older historic structures and newer architecture. The project site is located within the Downtown San Pedro Community Design Overlay (CDO) District, which provides guidelines and standards for development projects, including new development and improvements to existing properties, within Downtown San Pedro. The intent of the Downtown San Pedro CDO is to provide design guidance and direction to enhance identity and improve the appearance of the Downtown.

The project site is located in an urbanized setting and is surrounded by commercial uses, institutional uses, multi-family residential uses and surface parking lots. Other uses in the surrounding area include commercial and retail uses, institutional uses, and multi-family residential uses. The Harbor Village Shopping Center and surface parking are located north of the site, across 5th Street. The 5-story Port of Los Angeles offices and Port of Los Angeles High School are located to the northwest across 5th Street. A fast food restaurant and hotel are located to the east of the site. A restaurant and commercial uses are located south of the site, across 6th Street. A 16-story multi-family residential building and 12-story Marymount University building are located directly to the west, across Palos Verdes Street. The project site is located two blocks from the Los Angeles Port Police Headquarters, which is located at S. Center Street and 3rd Street. Fire Station #112 is located along the San Pedro Main Channel, north of 5th Street and south of the USS Iowa Museum.

[4] *California Scenic Highway Mapping System, State of California Department of Transportation, website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.*

San Pedro City Hall and the Los Angeles County Mental Health offices are located on 7th Street. The Los Angeles Fire Department Harbor Museum is located in the San Pedro City Hall and the Los Angeles Maritime Museum is located to the east of the waterfront. The Battleship USS Iowa is docked across S. Harbor Boulevard and is open to the public. The World Cruise Terminal is located to the north of the USS Iowa Museum. Many boat slips line the San Pedro Main Channel.

The streets in the area are landscaped with street trees. San Pedro Plaza Park is located one block southeast of the project site. The project site is one block to the east of the San Pedro Main Channel and ½ block east of John S. Gibson, Jr. Park, across S. Harbor Boulevard.

Impact of Proposed Project on the General Character of the Surrounding Area

The proposed residential project would alter the visual character of the project site as it would replace the existing commercial buildings, surface parking lots, and associated site landscaping with a six- to seven-story multi-family residential and retail development. The proposed project would have a visual impact without appropriate landscaping. The project would not introduce incompatible visual elements to the project site or in the surrounding area. The proposed six- to seven-story multi-family residential use would be consistent with the general character of the surrounding area and the existing uses in the immediate vicinity of the project site. The project would be up to 83 feet in height.

Heights and Massing

The project proposes the construction of a six- to seven-story, up to 83-foot tall residential building. With respect to building height and massing, land uses in the immediate vicinity of the project site are typically 1 to 12-story commercial/institutional buildings and up to 16 story mixed use buildings. The project vicinity is continuously evolving into a denser urban environment with new multi-family uses of increasing height and density.

The building heights and massing from the implementation of the proposed project would create a change in the visual character of the project site from what currently exists. However, it would be similar in height and massing compared to the recently developed commercial and multi-family residential structures surrounding the project site and is consistent with the evolving visual character of the area and the Regional Center land use designation for the area.

Architectural Style and Urban Design

The buildings surrounding the project site vary in age and architectural style from more contemporary structures to buildings that were constructed from the 1920s through the 1940s. The proposed project's design is a contemporary style that is more compatible with the more contemporary designs incorporated in buildings constructed in the area over the past 10 years. The proposed project would include architectural features, such as planters, balconies, and other articulated elements to the exterior façade.

Varying building materials are proposed such as concrete, metal panels, and other such contemporary materials to provide consistency with the recent development that has occurred near the project site. Roof top mechanical equipment, including satellite dishes, would be screened from adjacent street levels by raised parapet walls. These design features would be consistent with the design of the newer residential development located west of the project site along S. Palos Verdes Street.

As a result of the building's architectural design and orientation on the project site, the proposed project would be effectively integrated into the aesthetics of the project site and project area by means of design, architecture, size, massing, and location. Furthermore, the proposed project's location, height, scale, and architectural features are generally compatible with existing and planned development for the Downtown San Pedro Community Design Overlay (CDO) District. Implementation of Mitigation Measure I-10 would ensure that adequate landscaping is provided by the proposed project. With the inclusion of adequate landscaping, the aesthetic impacts of the proposed project would be less than significant.

Mitigation Measure

I-10 Aesthetics (Landscape Plan)

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

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

Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, a significant impact may occur if a 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

Light

The project site is located in a very well-lit urban area where there are high levels of ambient nighttime lighting including street lights, lighting from the Port of Los Angeles berths, architectural and security

lighting, indoor building illumination (light emanating from the interior of structures which passes through windows), and automobile headlights. Artificial light impacts are largely a function of proximity. The project site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular use. Since development surrounding the project site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.

The proposed project would have the potential to alter lighting patterns in the area of the project site as compared with the existing smaller scale buildings and parking lot uses. Lighting would be wall mounted or ground mounted and would be directed downward and shielded away from adjacent residential uses. Wall mounted security lighting would remain lit all night at each entrance and/or exit, but would be designated to prevent glare onto adjacent residential properties. Furthermore, the majority of lighting associated with the proposed project would be directed internally to the project site itself, away from neighboring land uses. Therefore, interior and exterior lights on the project site would not shine directly onto light-sensitive uses, and would not result in light trespass.

In addition, while the majority of the lighting would be directed towards the interior of the project site and would be directed away from neighboring residential land uses, the implementation of Mitigation Measure I-120 would ensure that any new light sources would not create significant lighting impacts on nearby residences across S. Palos Verdes Street. Therefore, impacts associated with illumination would be less than significant.

Glare

Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project site and exterior building windows. Excessive glare not only restricts visibility, but increases the ambient heat reflectivity in a given area.

Existing sources of glare within the project site include the reflection off existing residential buildings and their windows. The exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. Implementation of Mitigation Measure I-130 would ensure the inclusion of appropriate materials on the exterior of the building. In addition, the proposed building would incorporate exterior landscaping, as necessary, to reduce potential glare generated by windows and glass panels. As such, impacts associated with glare would be less than significant.

Mitigation Measures

I-120 Aesthetics (Light)

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

I-130 Aesthetics (Glare)

- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

I-200 Aesthetics (Screening on Parking Garages)

- Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the project site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the project site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in conjunction with any related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of related projects is expected to occur in accordance with adopted plans and regulations. While many of the related projects and the proposed project would be visible from public and private properties, the related projects and proposed project combined would not obstruct existing public scenic views.

With respect to the overall visual quality of the surrounding neighborhood, each of the related projects would be required to submit a landscape plan and signage plan (if proposed) to the Los Angeles Department of City Planning for review and approval prior to the issuance of grading permits. Any approvals granted to related projects are expected to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood. Therefore, cumulative aesthetic impacts would be less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.

The project site is fully developed with commercial buildings and associated parking lots and is located in a heavily urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or in the vicinity of the project site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the project site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the project site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[5] Therefore, no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The project site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The project site is currently zoned C2-2 and has a land use designation of Regional Commercial in the San Pedro Community Plan. The project site is not zoned for agricultural production, and there is no farmland at the project site.

[5] *Source: State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, Map, website: ftp://ftp.consrv.ca.gov/pub/Dlrp/FMMP/pdf/2012/los12.pdf.*

In addition, no Williamson Act Contracts are in effect for the project site.[6] 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 12222(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. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the conversion of land zoned 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)).

The project site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The project site is currently zoned C2-2 and has a land use designation of Regional Commercial in the San Pedro Community Plan. The project site is not zoned as forest land or timberland, and there is no Timberland Production at the project site. Therefore, no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project were to result in the loss of forestland or conversion of forest land to non-forest use.

The project site is fully developed with commercial buildings and associated surface parking lot uses, and is located in a heavily urbanized area of the City of Los Angeles. No forest land exists on or in the vicinity of the project site. Therefore, no impact would occur.

[6] *Williamson Act Program, California Division of Land Resource Protection, website: ftp://ftp.consrv.ca.gov/pub/Dlrp/WA/LA_12_13_WA.pdf.*

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 forestland to non-forest use?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The project site is fully developed with commercial buildings and associated surface parking lot uses, and is located in a heavily urbanized area of the City of Los Angeles. Neither the project site, nor nearby properties, are currently utilized for agricultural or forestry uses and, as discussed above (Section 2(a)), the project site is not classified in any "Farmland" category designated by the State of California. According to the City General Plan Conservation Element Exhibit B, the project site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the proposed project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forestland or conversion of forestland to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the project site and the surrounding area are not included in the Important Farmland category.[7] The project site and the related projects are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

3. 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 may occur if a 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 South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management

[7] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, ftp://ftp.consrv.ca.gov/pub/Dlrp/FMMP/pdf/2012/los12.pdf.*

Plans (AQMPs). The most recent of these was adopted by the Governing Board of the SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2012 AQMP are based on several assumptions. For example, the SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 4, 2012. The 2012 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

For general development projects, the SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections utilized in the formulation of the 2012 AQMP. As such, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds. It is assumed that the proposed project would comply with all SCAQMD rules and regulations that are in effect at the time of development and that are applicable to the project; the project applicant is not requesting any exemptions from the currently adopted or proposed rules.

The project involves the demolition of two existing buildings and surface parking lots and the construction of a six- to seven-story, up to approximately 83-foot tall mixed-use building, which would include 404 residential units, 5,200 sf ground floor retail, and 641 parking spaces. As discussed in Question 13(a) herein, the project would be consistent with the regional growth projections for the Los Angeles Subregion. In addition and further discussed herein, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. As such, the growth associated with the proposed project has been accommodated in the AQMP and the proposed project would be consistent with the 2012 AQMP. This is a less than significant impact.

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

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. The proposed project is located within the SCAQMD jurisdiction. To address potential impacts from construction and operational activities, SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table III-1 (SCAQMD's Significant Emissions Thresholds) be considered significant. The City of Los Angeles defers to these thresholds for the evaluation of construction-related and operational air quality impacts.

Table III-1
SCAQMD's Significant Emissions Thresholds

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carmon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.
Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2; Revised March 2015, accessed April 15, 2015.

Regional Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 19 months. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the proposed project would be undertaken in three main steps: (1) demolition of existing uses, 2) grading/site preparation/excavation, and (3) building construction.

Demolition would occur for approximately one month (22 construction days) and would require the demolition and removal of 36,248 square feet of existing uses. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and two tractors/loaders/backhoes.

Grading, site preparation and excavation would occur for approximately three months (70 construction days) and this analysis assumes the export of up to approximately 100,000 cubic yards (cy) of soil.[8] This analysis assumes daily grading, site preparation, and excavation activities would require the following equipment: one grader, one excavator, and two tractors/loaders/backhoes.

Building construction would occur for approximately 15 months and would include the construction of the proposed structure, connection of utilities, laying irrigation for landscaping, architectural coatings, paving, and landscaping the project site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two forklifts, one generator set, one tractors/loaders/backhoe, two welders, and one air compressor.

These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site 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 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. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2013.2.2) recommended by the SCAQMD.

Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table III-2, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

These calculations assume that appropriate dust control measures would be implemented as part of the 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.

As shown in Table III-2, assuming that the above measures are implemented, construction-related daily emissions associated with the project would not exceed any regional SCAQMD significance thresholds for

[8] *Project site is approximately 106,905 square feet and would require 3 levels of subterranean parking. Based on a review of the project plans, excavation to depths of 20 to 32 feet below grade would be required. Thus, this analysis assumes up to approximately 100,000 cubic yards of soil export.*

criteria pollutants during the construction phases. Regional construction impacts would be less than significant.

Regional Operational Emissions

Existing Conditions

The project site is currently developed with a vacant 11,248 square-foot building and a 25,000 square-foot building, which has approximately 14,875 square feet occupied. This analysis includes an estimate of existing air quality emissions from the occupied 14,875 sf office space. As such, air pollutant emissions are currently generated at the project site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the project site. The average daily emissions generated by the existing uses at the project site have been estimated utilizing CalEEMod 2013.2.2 recommended by the SCAQMD. As shown in Table III-3, Existing Daily Operational Emissions at project site, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the project site.

Table III- 2
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase						
Fugitive Dust	--	--	--	--	0.63	0.10
Off-Road Diesel Equipment	2.91	28.26	21.50	0.02	1.74	1.63
On-Road Diesel (Hauling)	0.14	2.18	1.73	0.01	0.16	0.06
Worker Trips	0.06	0.08	0.85	0.01	0.15	0.04
Total Emissions	***3.11***	***30.52***	***24.08***	***0.04***	***2.68***	***1.83***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading/Site Preparation/Excavation Phase						
Fugitive Dust	--	--	--	--	2.43	1.30
Off-Road Diesel Equipment	3.24	35.01	21.85	0.03	1.83	1.68
On-Road Diesel (Hauling)	3.33	51.82	41.17	0.13	3.85	1.53
Worker Trips	0.05	0.06	0.65	0.01	0.11	0.03
Total Emissions	***6.62***	***86.89***	***63.67***	***0.17***	***8.22***	***4.54***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	3.14	22.83	14.75	0.02	1.48	1.41
Building Construction Vendor Trips	0.82	7.89	10.89	0.02	0.67	0.27
Building Construction Worker Trips	1.90	2.54	26.64	0.06	4.61	1.25
Architectural Coatings	43.94	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.33	2.19	1.87	0.01	0.17	0.15
Architectural Coatings Worker Trips	0.34	0.46	4.82	0.01	0.92	0.25
Total Emissions	***50.47***	***35.91***	***58.97***	***0.12***	***7.85***	***3.33***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

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

Table III-3
Existing Daily Operational Emissions at Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NOx	CO	SOx	PM10	PM2.5
Summertime (Smog Season) Emissions						
Area Sources	0.39	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.04	0.04	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.69	1.94	8.03	0.02	1.15	0.33
Total Existing Emissions	**1.08**	**1.98**	**8.07**	**0.02**	**1.15**	**0.33**
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.39	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.04	0.04	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.72	2.04	8.01	0.02	1.15	0.33
Total Existing Emissions	**1.12**	**2.09**	**8.05**	**0.02**	**1.15**	**0.33**
Calculation data provided in Appendix A to this IS/MND. Column totals may not add due to rounding from the model results.						

Proposed Project

The project involves the operation of a six- to seven-story, up to approximately 83-foot tall mixed-use building, which would include 404 residential units, 5,200 sf of retail space, and 641 parking spaces. As such, air pollutant emissions would be generated at the project site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the project site. The analysis of daily operational emissions associated with the proposed project has been prepared utilizing CalEEMod 2013.2.2 recommended by the SCAQMD. The results of these calculations are presented in Table III-4, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the proposed project would not exceed the 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-4
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	16.32	0.40	34.44	<0.01	0.68	0.68
Energy Demand	0.07	0.58	0.25	<0.01	0.05	0.05
Mobile (Motor Vehicles)	10.44	30.50	123.54	0.31	21.08	5.93
Total Project Emissions	***26.82***	***31.48***	***158.23***	***0.32***	***21.81***	***6.66***
Less Existing Site Emissions	1.08	1.98	8.07	0.02	1.15	0.33
Net Increase Project Emissions	**25.74**	**29.50**	**150.16**	**0.30**	**20.66**	**6.33**

Table III-4
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	16.32	0.40	34.44	<0.01	0.68	0.68
Energy Demand	0.07	0.58	0.25	<0.01	0.05	0.05
Mobile (Motor Vehicles)	10.93	32.15	123.28	0.30	21.08	5.93
Total Project Emissions	***27.32***	***33.13***	***157.97***	***0.31***	***21.81***	***6.66***
Less Existing Site Emissions	1.12	2.09	8.05	0.02	1.15	0.33
Net Increase Project Emissions	**26.20**	**31.04**	**149.92**	**0.29**	**20.66**	**6.33**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Calculation data provided in Appendix A to this IS/MND. Column totals may not add due to rounding from the model results.						

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. A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Because the Basin is currently in nonattainment for ozone, nitrogen dioxide (NO_2), PM_{10} and $PM_{2.5}$, related projects may likely exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the proposed project contribution, 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, 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 impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed under Section 3 (b), above, the proposed project would not exceed any of the SCAQMD's recommended mass daily thresholds of significance for construction or operation. Also, as discussed in Section 3 (d), below, localized emissions generated by the proposed project would not exceed the

SCAQMD's Localized Significance Thresholds (LSTs). The project would be subject to regulatory compliance measures, which reduce the impact of operational and construction regional emissions. Therefore, the proposed project would not contribute to a cumulatively considerable increase in emissions for the pollutants for which the Basin is in nonattainment.

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. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest air quality sensitive receptors to the project site are residential uses located to the west across S. Palos Verdes Street, a Boys and Girls Club & daycare use located to the northeast across 5th Street, Port of Los Angeles High School located to the northwest, and a passive park/open space area to the east of Harbor Boulevard.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each Source Receptor Area (SRA) and various distances from the source of emissions. In the case of this analysis, the project site is located within SRA 1 covering Central Los Angeles.

Based on a review of the sensitive receptors described above, the nearest sensitive receptors are the residential uses located west of S. Palos Verdes Street, which are within 25 meters of the project site. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. The project site is approximately 2.47 acres. As such and consistent with SCAQMD recommendations, the localized thresholds for a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 1 have been used to address the potential localized NO_x, CO, $PM_{10,}$ and $PM_{2.5}$ impacts to the area surrounding the project site.

As shown in Table III-5, 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 a 2.47-acre site in SRA 1. Therefore, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table III-5
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 Emissions	**28.26**	**21.50**	**2.37**	**1.73**
SCAQMD Localized Thresholds	*83.90*	*934.83*	*7.80*	*5.08*
Potentially Significant Impact?	No	No	No	No
Grading/Site Preparation/Excavation Emissions	**35.01**	**21.85**	**4.26**	**2.98**
SCAQMD Localized Thresholds	*83.90*	*934.83*	*7.80*	*5.08*
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	**25.02**	**16.62**	**1.65**	**1.56**
SCAQMD Localized Thresholds	*83.90*	*934.83*	*7.80*	*5.08*
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings.
[a] The project site is 2.47 acres. As such and consistent with SCAQMD recommendations, the localized thresholds for all phases are based on a 2.47-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 4.
[b] The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, 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.
Calculation sheets are provided in Appendix A to this Draft IS/MND.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) from A-C 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 impact study (see Appendix G), the project would not meet these criteria at any of the studied intersections. Therefore, the project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants (TAC)

As the project consists of apartments and retail uses, the project would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from project implementation. In addition, construction activities associated with the project would be typical of other development projects in the City, and 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 project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The proposed project involves the construction and operation of apartment and restaurant uses, which are not typically associated with odor complaints. As the proposed project involves no elements related to industrial projects, no objectionable odors are anticipated. Therefore, the potential impacts associated with objectionable odors would be less than significant.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project. The proposed project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, impacts related to odors from construction of the proposed project would be less than significant.

Cumulative Impacts

Less than Significant Impact. As discussed in Question 3(c) above, a significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant. Because the South Coast Air Basin is currently in nonattainment for ozone, nitrogen dioxide (NO_2), PM_{10} and $PM_{2.5}$, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the proposed 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, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction and operational emissions generated by the project would not exceed any of thresholds of significance recommended by the SCAQMD. Also, localized emissions generated by the project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the project would not contribute a cumulatively considerable increase in emissions for the pollutants that the Basin is in nonattainment. Thus, cumulative air quality impacts associated with the project would be less than significant.

4. BIOLOGICAL RESOURCES

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- 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;
- 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

  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 Biological Assessment Planning Zone 4, Coastal Zone and Adjacent Uplands.[9] The project site is located approximately 2 miles from the Fort MacArthur Military Reservation, Palos Verdes Peninsula Coastline, and Terminal Island Significant Ecological Areas (SEAs).[10] However, the project site is fully developed with buildings and surface parking lot uses, and is located in a heavily urbanized

[9] *L.A. CEQA Thresholds, Guide 2006, Exhibit C-1.*

[10] *L.A. CEQA Thresholds, Guide 2006, Exhibit C-4.*

area. Based on review of Exhibit C-7 of the City of Los Angeles *L.A. CEQA Thresholds, Guide 2006*, and other biological reference documents, including the California Natural Diversity Database (CNDDB), federal and state agency lists, regulatory statutes, and applicable City documents there are no special status species located on the project site.

Although there are 68 privately-owned trees and 21 city-owned trees located on the project site; all of the trees are mature and there are no protected species trees as defined under Los Angeles Municipal Ordinance 177,404 on the project site. However, the project is located in an area close to the ocean and the Fort MacArthur Military Reservation, Palos Verdes Peninsula Coastline, and Terminal Island Pier 40SEAs. The project would result in the removal of vegetation and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Therefore, the proposed project would have a potentially significant impact related to nesting birds. This impact would be mitigated to less than significant by the following mitigation measure.

Mitigation Measures

IV-10 Habitat Modification (Nesting Native Birds, Hillside or Rural Areas)

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) shall take place outside of the breeding bird season which generally runs from March 1-August 31 (as early as February 1 for raptors) to take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning 30 days prior to the disturbance of suitable nesting habitat, the applicant shall:
    a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.

c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

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?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- 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;
- 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;
- The alternation of an existing wetland habitat; or

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 fully developed with buildings and surface parking lot uses and is located in a heavily urbanized area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the project site.[11] Implementation of the proposed project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. However, as noted above, in Section

[11] *Environmental and Public Facilities Maps: Significant Ecological Areas, Los Angeles City Planning Department, September 1, 1996.*

4.a, the proposed project would have a potentially significant impact related to nesting birds. This impact would be mitigated to less than significant by the implementation of Mitigation Measure IV-10.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 fully developed with buildings and surface parking lot uses and is located in a heavily urbanized area of the City of Los Angeles. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the project site.[12] Further, as it is fully developed, 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 implementation 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?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section 4(a), the project site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the vicinity of the project site. Therefore, implementation of the proposed project would have no impact on the movement of any resident or migratory fish or wildlife species. However, as noted above, in Section 4.a, the proposed project would have a potentially significant impact related to nesting birds. This impact would be mitigated to less than significant by the implementation of Mitigation Measure IV-10.

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[12] *National Wetlands Inventory, U.S. Fish & Wildlife Service, website: http://wetlandsfws.er.usgs.gov/imf/imf.jsp?site=NWI_CONUS.*

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404.

No protected species trees as defined under Los Angeles Municipal Ordinance 177,404 exist on the project site. The site contains several trees that are greater than 8 inches DBH. All trees 8 inches or more DBH that are removed will need to be replaced on a 1:1 ratio to reduce the biological impact to a less than significant level. With implementation of Mitigation Measures IV-70 and IV-90, impacts of the proposed project would be less than significant.

Mitigation Measures

IV-70 Tree Removal (Non-Protected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

IV-90 Tree Removal (Public Right-of-Way)

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.

- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

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

Less Than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. However, the project is located in an area close to the ocean and the Fort MacArthur Military Reservation, Palos Verdes Peninsula Coastline, and Terminal Island Pier 40SEAs. Mitigation Measures IV-10, IV-70, and IV-90 as required for impacts to trees and nesting birds would reduce the potential for any significant impacts. Therefore, this impact would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat is expected to occur in the vicinity of the related projects and the proposed project due to the existing urban development. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance. Although the project site does not contain any protected species trees, there is a possibility that some of the related projects could contain protected species trees. Any removal of protected species trees would be done in accordance with the City of Los Angeles Protected Tree Ordinance. Therefore, cumulative impacts to biological resources would be considered less than significant.

5. CULTURAL RESOURCES

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in 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 significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The proposed project site is developed with commercial and office uses and associated surface parking lots. These buildings were constructed in 1979 and are not old enough to be considered as historic resources. According to the City of Los Angeles ZIMAS, the project site is not located within any Historic Preservation Review area and does not require historic preservation review. [13]

Three resources in the area have been listed: the USS Los Angeles Naval Monument (John S. Gibson Jr. Park) has been listed as Los Angeles Historic-Cultural Monument #LA-188 since May 1978, the Municipal Ferry Building (Berth 84-foot of 6th Street) has been listed as Los Angeles Historic-Cultural Monument #LA-146 since September 1975, and the San Pedro Municipal Building (638 Beacon Street) has been listed as Los Angeles Historic-Cultural Monument #LA-732 since October 2002. [14] The San Pedro Main Post Officer

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[13] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 164 W 6th Street, website: www.zimas.lacity.org, accessed May 3, 2015. Survey LA, website: http://preservation.lacity.org/files/SPD_AppendixAFinal_07-12.pdf, accessed June 2, 2016. Historic Places LA, website: http://www.historicplacesla.org/map, accessed June 2, 2016.*

[14] *City of Los Angeles, Department of City Planning, Historic-Cultural Monument (HCM) Report, San Pedro Planning Community, website: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result.cfm?community=San%20Pedro, accessed May 3, 2015.*

(839 S. Beacon Street) has been listed on the National Register of Historic Places since January 1985, but is not listed as a Los Angeles Historic Cultural Monument.[15]

However, as previously discussed in the Aesthetics section 1 (c), the project would not introduce incompatible visual elements to the project site or to the surrounding area. As such, the proposed project would not cause any substantial adverse change in the immediate surroundings such that the significance of the historical resource would be materially impaired and impacts would be less than significant.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources potentially existing within the project site.

Based on a review of City of Los Angeles Environmental Hazard Maps, the project site and immediately surrounding areas is located in an area of known archaeological sites or archaeological survey areas.[16] However, the proposed project is located in a highly urbanized area of the City of Los Angeles and the project site has been subject to past disturbance, including the construction of commercial uses in the past. Any archaeological resources that may have existed near the site surface are likely to have been disturbed or previously removed. However, the proposed project would likely result in deeper excavations than previously performed on the site. As such, the possibility exists that deeper lying archeological artifacts may be present that were not recovered during prior construction or other human activity. While the uncovering of notable resources is not anticipated, the following mitigation measure is included to ensure that any potential impact to a previously unknown archaeological resource is reduced to a less than significant level. Thus, it is anticipated that via compliance with existing regulations, the proposed project impacts on any previously undiscovered archaeological resources would be less than significant.

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

Less Than Significant Impact. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the project site. No unique geologic features are located on the project site, which is entirely developed with commercial and surface parking lot uses. Based on a review of City of Los Angeles Environmental

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[15] *City of Los Angeles, Office of Historic Resources, Los Angeles Historic Resources Inventory, website: http://www.historicplacesla.org/reports/905572f3-59b1-4f85-b71c-fe825b2b7943, accessed May 3, 2015.*

[16] *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.*

Hazard Maps, the area immediate surrounding the project site may contain vertebrate and invertebrate paleontological resources.[17] However, a large portion of the Los Angeles Basin is underlain by bedrock and older surface sediments where fossils may be found.[18] The proposed project may result in deeper excavations than previously performed, and as such, the possibility exists that deeper lying paleontological artifacts that were not recovered during prior construction or other human activity may be present. As a result, the proposed project could uncover a unique paleontological resource or unique geologic feature. However the uncovering of notable resources is not anticipated and compliance with existing regulatory compliance measures would ensure impacts to paleontological resources are less than significant. Thus, it is anticipated that via compliance with existing regulations, project impacts to any previously undiscovered paleontological resources would be less than significant. Additionally, no unique geologic features are anticipated to be encountered during project construction. Therefore, the project would not directly or indirectly destroy a unique geologic feature and impacts would be less than significant.

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

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the project site. Any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. However, the proposed project would likely result in deeper excavations than previously performed on the site. As such, the possibility exists that deeper lying human remains may be present that were not recovered during prior construction or other human activity. If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, state Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the county coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code Section 5097), relating to the disposition of Nature American burials would be adhered to. Therefore, this impact would be less than significant.

e) Would the project cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American

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

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

Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?

Less than Significant Impact. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the project site. An informational letter was mailed to a total of nine (9) Tribes known to have resources in this area, on April 21, 2016, describing the project and requesting any information regarding resources that may exist on or near the project site. On May 23, 2016, one tribal response was received from the Soboba Band of Luiseno Indians explaining there are no concerns regarding known cultural resources in the specified areas that the project encompasses.

Cumulative Impacts

Less Than Significant Impact. Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, compliance with existing regulations would ensure the proposed project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, that the proposed project does not directly or indirectly destroy a unique paleontological resource and that the project does not adversely affect human remains. Compliance with existing regulations would be incorporated into the approval of each related project. Additionally, as discussed above, the proposed project would not result in any impacts to historic resources. As such, cumulative impacts to cultural resources would be less than significant.

6. GEOLOGY AND SOILS

The following section summarizes the information provided in the following documents:

- Report of Geotechnical Investigation Proposed High Rise Condominium Development 550 South Palos Verdes Street – San Pedro, December 20, 2004;
- Addendum Report – Multi-Family Structure 550 Palos Verdes Street – San Pedro, October 4, 2005;
- Response to City of Los Angeles Review, Lot 1 Tract 68077, 550 So. Palos Verdes Street – San Pedro, May 9, 2007; and

- Report of Geotechnical Investigation 160 West 6th Street – San Pedro (City of Los Angeles), January 15, 2008.

All reports were prepared by Dale Hinkle, P.E. Inc. The Geotechnical Reports are provided as Appendix C to this Draft Initial Study.

Would the project:

a) Expose 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.

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

The project site is located in the seismically active region of southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 Mw 5.9 Whittier Narrows earthquake, and the January 17, 1994 Mw 6.7 Northridge earthquake were a result of movement on the Puente Hills Blind Thrust Fault and the Northridge Thrust, respectively. These thrust faults and others in the Los Angeles Basin are not exposed at the surface and do not present a potential surface fault rupture hazard; however, these active features are capable of generating future earthquakes.

The project site is located 2.1 miles west from the Palos Verdes Fault, 2.1 miles south of the San Andreas Fault, 8 miles southwest of the Newport Inglewood Fault and 20 miles south of the Whittier Elsinore fault. The maximum credible magnitude earthquake is an 8.3 from the San Andreas Fault. The California Department of Mines and Geology show a 10% probability of any reoccurrence at the site.[19] There are no mapped active or potentially active faults identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, known to be present on or beneath the project site.

No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the site

[19] *Dale Hinkle P.E. Inc, Report of Geotechnical Investigation Proposed 4-Story Multi-Use Structure, 160 West 6th Street, San Pedro, California, December 20, 2004.*

during the design life of the proposed development is considered low. Impacts would be less than significant.

b) Expose 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. Because the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Thus, in order to be considered a significant geologic impact under the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the project must exceed the typical risk of hazard for the region. Therefore, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

As discussed above in section 6.a) proposed project site could be subject to strong seismic shaking from regional conditions. However, the proposed project would be designed and constructed in accordance with state and local building codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG), which provides guidance for the evaluation and mitigation of earthquake related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Therefore, impacts related to strong seismic ground shaking would be less than significant.

c) Expose 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project site is located within a liquefaction zone.

Liquefaction involves sudden loss in strength of a saturated, cohesionless soil (predominantly sand) caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement and can also cause lateral ground deformations. Typically, liquefaction occurs in areas where there are loose sands and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.

The site at 550 Palos Verdes Street is not located within an area identified as having potential for liquefaction. However, the southeast portion of the site at 160 W 6th Street is located in an area of liquefaction and is designated as a Liquefaction Zone by the City of Los Angeles. [20], [21],[22]

The site is underlain by the Pleistocene Age San Pedro Formation. The water table on the 550 Palos Verdes site is approximately 20 feet deep and liquefaction is not considered a threat. The water table on the 150 W 6th Street site is approximately 13 feet deep. According to the Geotechnical Report, further testing is required on the 150 W 6th Street site to determine the extent of area subject to liquefaction and for the design of appropriate design parameters. Therefore, impacts with respect to potential liquefaction would be potentially significant. Regulatory Compliance Measure RC-GEO-4 would reduce the impact to a less than significant level.

d) Expose 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The site is within a City of Los Angeles Special Grading Area or a Hillside Ordinance Area.[23] However, according to the State of California Seismic Hazard Zone, San Quadrangle Map,[24] the site is not located within an area identified as having potential for slope instability. According to the City of Los Angeles Seismic Safety Element, the site is located within an area identified as having potential for small, shallow surficial landslides. [25] The site slopes gently to the southeast. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Compliance with existing regulations would ensure that impacts from potential landslides would be less than significant.

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[20] CDMG, 1999. State of California Seismic Hazard Zone, San Pedro Quadrangle Map.

[21] City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes Street and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 20, 2015.

[22] Report of Geotechnical Investigation 160 West 6th Street – San Pedro (City of Los Angeles), January 15, 2008.

[23] City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes Street and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 20, 2015.

[24] CDMG, 1999. State of California Seismic Hazard Zone, San Pedro Quadrangle Map.

[25] City of Los Angeles, 1996.

e) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving substantial soil erosion or the loss of topsoil?

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have significant sedimentation or erosion impact if it would:

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- 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.

The majority of the area surrounding the project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the proposed project. During construction, the proposed project would be required to prevent the transport of sediments from the project site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a Stormwater Pollution Prevent Program (SWPPP), which must be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Long-term operation of the proposed project would not result in substantial soil erosion or loss of topsoil as the majority of the project site would be covered by the structure and paving, while the remaining portions of the project site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the proposed project.

The construction of the proposed 385,300 square foot mixed use building could potentially result in substantial soil erosion or the loss of topsoil. Implementation of Mitigation Measures VI-20 and VI-40 would reduce the impact to a less than significant level.

Mitigation Measures

VI-20 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

VI-40 Grading (20,000 Cubic Yards, or 60,000 Square Feet of Surface Area or Greater)

- A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report

weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.

- "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.

- "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.• Movement and removal of approved fencing shall not occur without prior approval by LADBS.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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. For the purpose of this specific issue, a significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions 6 (a)(iii) and 6 (a)(iv), above.

Old/Uncertified Fill

The 550 S. Palos Verdes site has been filled with silty sand with some construction materials over natural San Pedro sand. The fill starts near the north end of the site and tends to get deeper to the south and east. The 160 W 6th Street site borings showed 15 to 26 feet of fill over sand and clay layers (believed to be San Pedro Formation). The fill contains bricks, concrete, and what appears to be demolition debris, likely from the 1933 Long Beach earthquake. It should be anticipated that there is the potential for uncertified fill to be present anywhere on the project site. The debris fill mixture is not acceptable as structural fill. It is possible to use most of the soil, but the debris must be removed. The debris fill can be re-compacted to support pavement; otherwise, per the recommendations of the Geotechnical Report, these areas should only be used for landscape areas. Therefore, impacts with respect to potential subsidence would be less than significant.

Bedrock

The site is underlain by the Pleistocene Age San Pedro Formation. The San Pedro Formation consists of fine to medium-grain, massive to finely laminated, well-consolidated sandstone and siltstone. The soils are primarily slightly moist to wet and medium dense to very dense or stiff.

There is no evidence that the project site is susceptible to lateral spreading or subsidence. The site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. The site is not located within the production area or within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general vicinity. Therefore, there is little or no potential for ground subsidence due to withdrawal of fluids or gases at the site.

All construction would comply with the City of Los Angeles Building Code, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. Compliance with existing regulations would ensure that potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Soils on the project site are not expansive. Additionally, construction of the proposed project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code, which include building foundation requirements appropriate to site-specific conditions. With compliance with existing regulations, implementation of all site-specific requirements that would be identified in the Department of Building and Safety's Geology and Soils Approval letter when issued, impacts associated with soils would be less than significant.

h) 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?

Less Than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, this question would apply to a 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. The existing uses are connected to the City's sewer system and no septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Impacts would be less than significant.

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 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 mitigation measures. Furthermore, the analysis of the proposed project's geology and soils impacts concluded that project impacts would be less than significant. Therefore, the proposed project would not contribute to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

7. GREENHOUSE GAS EMISSIONS

Background

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and similar to a greenhouse, create an increase in temperatures. The major concern with GHG emissions is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), 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 has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Regulatory Environment

State

Assembly Bill 32 (Statewide GHG Reductions)

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.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

CARB has adopted the First Update to the Climate Change Scoping Plan.[26] This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the

[26] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014.*

State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO2e. As part of the update, CARB revised the 2020 Statewide limit to 431 million metric tons of CO2e, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual (BAU) forecast in the update is 509 million metric tons of CO2e. The State would need to reduce those emissions by 15 percent to meet the 431 million metric tons of CO2e 2020 limit.

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State.

California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards (CALGreen) Code

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2013 Title 24 standards (effective as of January 1, 2014) were revised and adopted in part to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2014 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). As noted on page 37 in the First Update to the Scoping Plan (May 2014), building efficiency standards were updated in 2013 and are now 25 percent more efficient for residential construction and 30 percent more efficient for non-residential construction.[27]

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO2 to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

In 2010, the City adopted the 2010 California Green Building Standards Code, also known as CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Building Code. As stated in Section 99.01.101.1 of the LAMC, these regulations shall be known as the Los Angeles Green Building Code and may be cited as such. The Los Angeles Green Building Code is Article 9 of a total of 9 Articles of Chapter IX of the LAMC, and adopts by reference the CALGreen Code except as amended therein. The provisions of this code shall apply to the construction of every new building, every building alteration with a building permit valuation of $200,000 or more, and every building addition, unless otherwise indicated in this code, throughout the City.

The Los Angeles Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Los Angeles Green Building Code

[27] *Computed from California Energy Demand, 2012–2022 Final Forecast, June 2012, Form 2.2 on Committed Energy Impacts.*

requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards. In addition, the proposed project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32, described above.

GHG Significance Threshold

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 commercial project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines and a draft screening threshold considered by the SCAQMD.

As outlined in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) 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.

With respect to demonstrating consistency with AB 32 and the State's Scoping Plan, one methodology commonly used to demonstrate consistency with the State's Scoping Plan is to compare the proposed project's mitigated scenario to a BAU scenario that quantifies the project's potential GHG emissions absent the proposed project's project design features, energy conservation commitments, and GHG emission regulations tied to AB 32. This assessment essentially provides a quantified estimate of the project's GHG emissions as if the State were to proceed on its pre-AB 32 emissions track. As discussed previously in this section, CARB estimates a 15.3 percent reduction below the estimated statewide BAU levels would now be necessary to return to 1990 emission levels (i.e., 431 MMTCO2E) by 2020, instead of the 28.35 percent and 16 percent BAU reductions previously reported under the 2008 and 2011 Scoping Plan estimates. Therefore, a project that is able to demonstrate a 15.3 percent reduction in GHG emissions as compared to the BAU scenario, would be considered consistent with AB 32 and the State's goal of achieving 1990 GHG emission levels by the year 2020.

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

Potentially Significant Unless Mitigation Incorporated. Construction and operation (i.e., use of the residences by occupants and mobile emissions associated with such use) of the proposed project would generate greenhouse gas emissions.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. As explained by California Air Pollution Controls Officers Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (CEQA Guidelines §15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are reported on an annual basis.

Emissions of GHGs were calculated using CalEEMod 2013.2.2 for each year of construction of the proposed project and the results of this analysis are presented in Table III-6, Project Construction-Related GHG Emissions. As shown in Table III-6, the greatest annual increase in GHG emissions from project construction activities would be 1,242.86 metric tons in 2016, and total construction GHG emissions would be 1,924.88 metric tons.

Table III-6
Project Construction-Related GHG Emissions

Year	CO_2e Emissions (Metric Tons per Year)
2016	1,242.86
2017	682.02
Total Construction GHG Emissions	**1,924.88**
Calculation data and results are provided in Table 2.1 Overall Construction (Project Construction and Operation with GHG Reducing Measures) Appendix A to this Draft IS/MND.	

Operational GHG Emissions
Existing Conditions

The project site is currently developed with a vacant 11,248 square-foot building and a 25,000 square-foot building, which has approximately 14,875 square feet occupied. This analysis includes an estimate of existing GHG emissions from the occupied 14,875 sf office space. GHG emissions are currently generated by the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater.

The GHG emissions generated by the existing uses at the project site have been estimated utilizing CalEEMod 2013.2.2 recommended by the SCAQMD and are shown in Table III-7, Existing Greenhouse Gas Emissions. As shown, GHG emissions generated by existing conditions at the project site are approximately 414.58 CO2e MTY.

Proposed Project

The project involves the operation of a six- to seven-story, up to approximately 83-foot tall mixed-use building which would include 404 residential units, 5,200 sf ground floor retail, and 641 parking spaces. The GHG emissions resulting from operation of the proposed project, which involves the use of on-road motor vehicles, energy (electricity and natural gas), area sources (hearth and landscaping), water, and generation of solid waste and wastewater, were estimated with the incorporation of the following GHG reduction measures:

- Project compliance with the LA Green Code and CALGreen Code would result in 30 percent energy savings for non-residential uses and 25 percent for residential uses;
- The project would include energy-efficient appliances;
- The project would reduce water demand by at least 20 percent due to low-flow and/or high efficiency water fixtures such as low-flow toilets, urinals, showerheads, faucets, and high-efficiency clothes-washers and dishwashers;
- Due to the project's mixed-use nature and urban location, motor vehicle -related GHG emissions attributed to the project's P.M. peak hour retail trips would be reduced by 10% due to internal capture and 50% due to pass-by credits.[28]

In addition to these quantified GHG reduction measures, the project would also include the following additional features that would serve to reduce GHGs.

- Mass transit: As detailed in the project's traffic impact study (Appendix G-1), numerous public bus services within the project area are currently provided by Los Angeles County Metropolitan

[28] *Traffic Impact Study for 550 S. Palos Verdes Street, San Pedro, California, prepared by KOA Corporation, May 2015.*

Transit Authority (Metro), the City of Los Angeles Department of Transportation (DASH & Commuter Express), and the Palos Verdes Peninsula Transit Authority.

- Bicycle Usage: As detailed in the project's traffic impact study, numerous bike lanes and routes are available within the project area;
- Vegetation & Landscape Irrigation Systems: The project would include drought-tolerant landscaping and will implement efficient landscape irrigation techniques, such as "smart" irrigation technology, to reduce water use and its associated GHG emissions. "Smart" irrigation systems rely on weather, climate and soil moisture information to adjust watering frequency, hence maintaining the vegetation is adequately moist while conserving water;
- Energy Reduction: The project would include high-efficiency lighting and infrastructure to support solar panels;
- Alternative Fuel Vehicles: The project would provide on-site electric vehicle (EV) charging stations, supporting and promoting the use of electric vehicles.

As shown in Table III-8, Project Operational Greenhouse Gas Emissions, the project's net increase in GHG emissions would be 6,174.61CO_2e MTY.

Table III-7
Existing Greenhouse Gas Emissions

Emissions Source	Estimated Project CO_2e Emissions (Metric Tons per Year)
Energy (Electricity & Natural Gas)	129.35
Mobile (Motor Vehicles)	246.38
Solid Waste Generation	6.30
Water Demand	32.55
Existing Project Site Total	**414.58**
Calculation data and results provided in Appendix A to this Draft IS/MND.	

Table III-8
Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO2e Emissions (Metric Tons per Year)
Area	96.69
Energy (Electricity & Natural Gas)	1,767.65
Mobile (Motor Vehicles)	4,296.35
Solid Waste Generation	79.22
Water Demand	285.12
Construction Emissions[a]	64.16
Project Total	**6,589.19**
Less Existing Project Site	414.58
Project Net Increase	**6,174.61**

[a] The total construction GHG emissions were amortized over 30 years and added to the operation of the project.
Calculation data and results provided in Appendix A to this Draft IS/MND.

Although the project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. As discussed in recent CEQA case law,[29] the global scope of climate change and the fact that carbon dioxide and other greenhouse gases, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for greenhouse gases, it does not. For individual projects, like the proposed mixed-use development, which are designed to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of greenhouse gas emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure. Meeting our statewide reduction goals does not preclude all new development. Rather, the Scoping Plan - the state's roadmap for meeting AB 32's target - assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation

[29] *Supreme Court of California, Center for Biological Diversity et al. v. California Department of Fish and Wildlife (2015), S217763, 11-13.*

measures sufficient to contribute its portion of the overall greenhouse gas reductions necessary, one can reasonably argue that the project's impact is not cumulatively considerable, because it is helping to solve the cumulative problem of greenhouse gas emissions as envisioned by California law.[30]

As discussed above, the project would include numerous GHG reduction measures that meet and exceed applicable plans, policies and regulations adopted for the purpose of reducing GHGs. Specifically, the project would be consistent with the following:

- LA Green Code and CALGreen Code: Project compliance with the LA Green Code and CALGreen Code would result in 30 percent energy savings for non-residential uses and 25 percent for residential uses;
- City of Los Angeles Sustainability Plan Goals (pLAn): Reduce average per capita water use by 20%; improve energy efficiency and locate new housing within transit areas;
- SB 375 and RTP/SCS: SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 MPOs have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. As stated above, the project's mixed-use nature and urban location, motor vehicle -related GHG emissions attributed to the project's P.M. peak hour retail trips would be reduced by 10% due to internal capture and 50 percent due to pass-by credits. In addition, and stated above, the project is located in area supported by numerous bus lines and bicycle routes that would serve as viable options for alternative transit. Therefore, the project's mixed-use design, urban location, and proximity to alternative transit would be consistent with local and statewide goals and policies (i.e., RTP/SCS and SB 375) aimed at reducing the generation of GHGs through integrated transportation, land use, housing and environmental planning.

Mitigation Measures

VII-10 Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project to reduce VOC emissions to the maximum extent practicable.

- To encourage carpooling and the use of electric vehicles by Project residents and visitors, at least twenty (20)% of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to

[30] *Addressing the Significance of Greenhouse Gas Emissions, supra, 4 Golden Gate U. Envtl. L.J. at p. 210.*

verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

Conclusion

Due to the project's GHG reduction strategies, compliance with the Los Angeles Green Building Code and CALGreen Code, and the project's mixed-use design, urban location, and access to alternative transit, the project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including AB 32, SB 375, and the RTP/SCS. Therefore, the project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant with the implementation of Mitigation Measure VII-10.

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

No Impact. Although not specified in the City of Los Angeles CEQA Thresholds Guide, a significant impact would occur if the proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As described in Question 7(a) above, the project's mixed-use design, urban location, proximity to transit, and compliance with the CALGreen Code and Los Angeles Green Building Code, would ensure consistency with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 375 and CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the proposed project's generation of GHG emissions would not be cumulatively considerable and would not conflict with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases. Therefore, no impact would occur.

Cumulative Impacts

Less than Significant Impact. As discussed in Questions 7(a) and 7(b) above, the project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the project's generation of GHG emissions would not make a cumulatively considerable contribution to an impact related to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gasses. The cumulative impact would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

The following section summarizes the information provided in the Phase I Environmental Site Assessment, 550 S. Palos Verdes Street, San Pedro, California, dated December 27, 2014 prepared by West Coast Environmental and Engineering, and the Phase I Environmental Site Assessment, Commercial Property 140-160 West 6th Street, Los Angeles, California, prepared by DRPA Incorporated, dated December 20, 2007. The Phase I Environmental Site Assessments are provided as Appendix E to this Initial Study.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- 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;
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following specific checklist questions are evaluated applying the foregoing methodology.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or

  The project involved the creation of any health hazard or potential health hazard.

A portion of the property was previously occupied by a retail paint store and associated parking area. Although paints and solvents are considered as hazardous materials, the store on this site has relocated and is no longer located on this site. The Phase I Environmental Site Assessment (ESA) prepared for the

site found no recognized environmental conditions on the site, even when the paint store was still in operation. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include multi-family residential uses located on S. Palos Verdes Street, both directly across from the project site and to the south of 6th Street. The proposed project is a mixed-use and residential project. Other than typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. As a mixed use residential development, the proposed project would not involve large quantities of hazardous materials that would require routine transport, use, or disposal. With compliance to applicable standards and regulations and adherence to manufacturer's instructions related to the transport, use, or disposal of hazardous materials, the proposed project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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?

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or

  A project involved the creation of any health hazard or potential health hazard.

A Phase I Environmental Site Assessment (ESA) for 550 S. Palos Verdes Street, San Pedro, California, dated December 27, 2014 was prepared by West Coast Environmental and Engineering. A Phase I ESA for Commercial Property 140-160 West 6th Street, Los Angeles, California, was prepared by DRPA Incorporated, dated December 20, 2007.

Review of Historical Site Use

Based on a review of historical sources, the project site at 550 S. Palos Verdes was undeveloped until 1908. City directory listings show the address listed as a restaurant, union halls, the San Pedro Chamber of Commerce, and the Eagles Lodge Hall. A paint company was located on the site beginning in 1995.

The project site at 140-160 W 6th Street has been developed since 1886 with a livery feed (1886-1908), a bank (1921), and retail stores (1950-1969). The site was undeveloped from 1969 through 1979, when the current building was constructed. Since that time, the building has been occupied with a café, liquor store, and travel agent offices. The site is currently occupied by numerous office spaces.

Review of Aerial Photographs

Based on the aerial photograph review, the project site at 550 S. Palos Verdes and surrounding area was developed with several structures by 1928. The surrounding area became more developed on the 1965 aerial photo. The site is shown as vacant in the 1976 aerial and the current structure is shown on the site in the 1989 aerial.

Aerial photos show the site at 140-160 W 6th Street developed with a commercial building from 1940-65, surrounded by other commercial uses. The site is vacant by 1976. A parking lot is located to the west of the site. The current building is shown on aerials from 1989-2002, surrounded by other commercial buildings.

Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. A search was made of the Environmental Data Resources, Inc. (EDR) collection of Sanborn Fire Insurance maps.

Based on the Sanborn Maps review, from 1908 to 1950 the project site at 550 S. Palos Verdes has consisted of vacant lots, followed by commercial uses including restaurants, lodge hall, union hall, and various shops. A glazing business is shown on a 1950 map.

Sanborn Maps for the 140-160 W 6th Street site show two stables with various other buildings being constructed on the site in time period from 1886 to 1902. Starting in 1902, the site is shown with a structure labeled “Paints and Wallpaper.” From 1908 to 1921 various stores and businesses are shown including a music, electric fixtures, liquor stores; a bank, and office. Uses shown form 1950 to 1969 include a restaurant, stores labeled “Some Paint” and “Some Oil,” and other unlabeled stores.

Site Visit

A site visit was conducted at 550 S. Palos Verdes when the paint store was still in operation. No spills or evidence of staining of hazardous materials was noted. A site visit to 140-160 W 6th Street did not identify any hazardous materials on the site.

Asbestos-Containing Materials

The proposed project site has two existing commercial and office structures. An asbestos survey was conducted as part of the Phase I ESAs, but due to the age of the buildings there is a potential that Asbestos-Containing Materials (ACMs) are present. Since the project would redevelop the properties, a thorough asbestos survey to identify asbestos-containing building materials is required in accordance with the EPA NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb suspect ACMs. Mitigation measures are recommended for the handling of asbestos-containing materials.

Lead-Based Paint

The proposed project site has two existing commercial and office structures. An asbestos survey was conducted as part of the Phase I ESAs, but due to the age of the buildings there is a potential that Lead-Bases Paint (LBPs) are present. Since the project would redevelop the properties, a thorough survey to identify LBP is required. Local regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Actual material samples would need to be collected or an x-ray fluorescence (XRF) survey performed in order to determine if LBP is present. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62. Mitigation measures are recommended for the handling of asbestos-containing materials.

Radon

According to the U.S. Environmental Protection Agency (EPA), the project site, being located in Los Angeles County, is situated within Radon Zone 2, with a predicted average indoor radon screening level between 2 and 4 picoCuries per Liter (pCi/L, moderate potential). Based on the January 2005 Radon Potential Zone Map for Southern Los Angeles County, published by the California Department of Health Services (DHS), the project site is located in an area of low potential (six percent) for indoor radon levels above the 4.0 pCi/L action level. Therefore, impacts would be less than significant.

Methane

The project site is not located within a "Methane Zone" as designated by Los Angeles Department of Building and Safety (LADBS).[31] Therefore, there would be no risk from methane.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or

  A project involved the creation of any health hazard or potential health hazard.

[31] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 21, 2015.*

The closest school to the project site is the Port of Los Angeles High School, located approximately 400 feet northwest of the project site. Compliance with existing regulations would reduce this impact to less than significant. Additionally, as stated in 8(a), above, the proposed project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. 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?

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 where 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 a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The following historical addresses were associated with the subject property: 550 S. Palos Verdes and 140-160 W 6th Street. These addresses were researched as part of this assessment. Neither the project site nor any of the adjacent properties are listed on any regulatory database listing.

Several surrounding properties are listed on the following regulatory or other databases:

Regulatory or Other Database Listing(s)	Number of Surrounding Sites	Likely to Impact Site
RCRA-LQG	1	No
RCRA-SOG	4	No
ERNS	3	No
FINDS	6	No
HIST CAL-SITES	1	No
CORTESE	5	No*
LUST	8	No
CA FID AND SWEEPS	6	No
CHMIRS	6	No*
Los Angeles County Site Mitigation Log	1	No

Regulatory or Other Database Listing(s)	Number of Surrounding Sites	Likely to Impact Site
VCP	1	No
DRYCLEANERS	1	No
RESPONSE	2	No*
HAZNET	15	No
Emissions Inventory Data	3	No
ENVIROSTAR	10	No
EDR Historical Auto Stations	5	No
EDR Historical Cleaners	10	No

See notes below.

Notes: only five sites were detailed in the Phase I ESA:

- Seventh Street Garage. Identified on LUST, HAZNET, SWEEPS UST, and CA FID UST regulatory databases. Closed in January 1997, with no further investigation or remediation required.
- Pacific Bell. Identified on SWEEPS UST, HIST UST, CA FID UST, UST, and HAZNET Regulatory databases. Post remedial action began in 1989.
- 302 W 5th Street. August 2003 oil release to bay.
- 461 W 6th Street. Release of unreported amount of substance. Case closed January 15, 2001.
- Richards Cleaners. Preliminary Endangerment Assessment Report, 2008.

As discussed in Section 8 (b), the site is not included on any list of hazardous materials sites. In addition, the project site is not a City designated Hazardous Waste / Border Zone Property.[32] Since the site is not listed, this impact related to hazardous materials sites would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

[32] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes Street and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 21, 2015.*

The closest public airports to the project site are the Torrance Airport and Long Beach Airport. However, neither of these airports are located within two miles of the project site. Furthermore, the project site is not in an airport hazard area.[33] Therefore, no impact would occur.

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

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 a safety hazard.

The project site is not located in 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved possible interference with an emergency response plan or emergency evacuation plan.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The degree to which a project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

The proposed project is not located on, but is located near Harbor Boulevard, an adopted emergency response or evacuation route.[34] However, the project would not result in significant traffic impacts. Additionally, the proposed project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way (see Section 16, Transportation/Traffic of this Initial Study). Therefore, the proposed project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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[33] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes Street and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 21, 2015.*

[34] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Critical Facilities & Lifeline Systems in the City of Los Angeles, April 1995.*

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if the project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The project site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[35] Therefore, no impacts from wildland fires would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. As with the proposed project, 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 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.

9. 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on surface water quality if discharges associated with a 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. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems.

[35] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes Street and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed May 21, 2015.*

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). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001 that requires new development and redevelopment projects to incorporate storm water mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that "results in the creation, addition, or replacement of 5,000 sf or more of impervious surface area on an already developed site." Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the project site. Site Specific Mitigation Plans are only required for the following uses: vehicle or equipment fueling, maintenance, washing, and repair areas; commercial or industrial waste handling or storage; outdoor handling or storage of hazardous materials; outdoor manufacturing areas; outdoor food handling or processing; outdoor animal care, confinement, or slaughter; outdoor horticultural activities; and major transportation projects. The proposed project would not involve any of these uses. Therefore, the proposed project would not be required to implement a Site Specific Mitigation Plan.

The proposed project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Additionally for construction activities, the Applicant would be required to prepare and implement a SUSMP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP would detail the treatment measures and Best Management Practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of project development. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the project Storm Water Pollution Prevention (SWPP) Plan. The SWPP Plan would contain BMPs to minimize primarily construction-related water quality impacts, but also contains some permanent BMPs. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the project. These BMPs are outlined in included in City regulatory compliance measures. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level. Through preparation and implementation of both the SWPP Plan and the SUSMP and implementation of a storm water quality treatment system, water quality impacts of the project would be minimized. Additionally, because the current site does not currently operate under a SUSMP, implementation of the proposed project with a SUSMP would improve water quality leaving the project site in comparison to existing conditions. Thus, impacts would be less than significant.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:
  - 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;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

The project would use a municipal water supply and would not include any wells. The project is located on the Pleistocene Age Sand Pedro Formation and is underlain by uncertified fill, surficial soil, and San Pedro sand.[36] As found on the project site, the San Pedro is a massive, fine to medium-grained, lightly cemented sandstone that is tan/yellow in color. The unit is found in the upper 200 feet investigated on the property, with few bedding features evident. Minor amounts of groundwater were encountered during recent borings at a depth of 13 to 20 feet below ground surface depending on the location on the site.[37]

It is anticipated that excavation to a depth of approximately 32 feet below grade for the construction of the proposed subsurface parking levels would be performed. Although it is not uncommon for groundwater levels to vary seasonally or for groundwater conditions to develop where none previously existed, especially in impermeable fine-grained soils which are subjected to excessive irrigation or precipitation, groundwater seepage should be anticipated if excavations extend to these elevations. Therefore, some dewatering of the site could be required. However, this amount of dewatering would be minor and would not substantially deplete groundwater supplies. The site is developed with buildings and

[36] *Report of Geotechnical Investigation 160 West 6th Street – San Pedro (City of Los Angeles), January 15, 2008.*

[37] *Ibid.*

impervious surfaces. Therefore, the project would not change existing conditions on the site to the extent that it would interfere with groundwater recharge.

Construction of the proposed project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the LADBS Geology and Soils Report Approval Letter, when issued, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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.

Construction is regulated by the Los Angeles Building Code (Sections 91.7000 through 91.7016 of the LAMC). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards (cy) that will occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by the Department of Building and Safety.

Under the NPDES, the State Water Resources Control Board has issued two general stormwater discharge permits for Los Angeles County to cover industrial and construction activities. The permits are required for specific industry types based on standard industrial classification and for construction activities on one acre or more.

The RWQCB oversees implementation and enforcement of the general permits, including Waste Discharge Requirements (WDR). The Public Works Department, Bureau of Engineering, Stormwater Management Division, is the agency responsible for overseeing implementation of permit responsibilities for the City. Presently, under the General Construction Stormwater Permit, projects greater than one acre are required to incorporate, to the maximum extent possible, permanent or post-construction BMPs in project planning and design. During project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to

stringent controls imposed via NPDES, SWPP and SUSMP regulations as discussed under Section 9(a) above.

Furthermore, the project site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the project vicinity. The project site is fully paved. Although the proposed project would not increase the amount of impervious surface area on the project site through the development of 385,300 square feet of mixed use and multi-family residential use, the site is a redevelopment site and will be required to implement drainage and run-off requirements consistent with the RWQCB low-impact development standards.

As noted, all the runoff associated with the proposed project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The proposed project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drains in Palos Verdes Street, 5th Street, and 6th Street. Therefore, the proposed project would not exceed capacity of the existing or planned storm water drainage systems or result in substantial erosion or siltation on- or off-site. Proposed project impacts would be 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 increase the amount of impervious surface area on the project site since the project site is already developed with impervious surfaces. As noted, all the runoff associated with the proposed project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The proposed project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain that is currently located in Palos Verdes Street, 5th Street, and 6th Street. Therefore, the proposed project would not substantially alter the existing drainage pattern of the project area. The proposed project will be required to control stormwater runoff using best management practices and a retention basin. Proposed project impacts will be less than significant.

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

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant impact on surface water quality if discharges associated with a 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 NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the project site were to increase to a level which exceeds the capacity of the storm drain system serving the project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the proposed project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the SUSMP and City of Los Angeles Stormwater Management Program. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the proposed project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and

suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, and the SWRCB. Further, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the proposed project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for water quality impacts to a less than significant level.

In addition, the proposed project would be subject to the provisions of the Low Impact Development (LID) Ordinance, adopted by the City Council on September 28, 2011, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and Best Management Practices (BMPs) that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance will require the project to incorporate LID standards and practices to encourage the beneficial use of rain water and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the site. As such, the project would include measures that would reduce the potential for runoff to exceed the capacity of the stormwater drainage system as discussed under Section 9(a) and (c) above.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

During construction, sediment is typically the constituent of greatest potential concern. The greatest risk of soil erosion during the construction phase occurs when site disturbance peaks due to grading activity and the removal and re-compaction or replacement of fill areas (sediment is not typically a constituent of concern during the long-term operation of developments similar to the proposed project because sites are usually paved, and proper drainage infrastructure has been installed). Other pollutants that could affect surface-water quality during project construction include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, rodenticides, etc.).

Once the proposed project has been constructed, urban runoff might include all of the above contaminants, as well as trace metals from pavement runoff, nutrients and bacteria from pet wastes, and landscape maintenance debris may be mobilized in wet-season storm runoff from roadway areas, parking areas, and landscaping, and in dry-season “nuisance flows” may result from landscape irrigation. Liquid product spills occurring at the project site could also enter the storm drain. Dry product spills could enter

the storm drain via runoff in wet weather conditions or dry-season "nuisance flows." Runoff from the exposed portions of the proposed project's driveway would be intercepted by a filtered trench drain device before outletting to the street, while water from the building roof would be directed to a series of downspouts and routed through inline downspout filter devices, with NPDES planter devices utilized prior to discharge off-site. These BMPS are anticipated to treat storm water runoff and reduce the potential for impacts associated with the degradation of water quality.

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. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact would occur if a 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.

The proposed project is not located within a City-designated Flood Hazard Zone.[38] Therefore, the proposed project would not place housing within a 100-year flood hazard area and no impact would occur.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project was located within a 100-year flood zone, which would impede or redirect flood flows.

As discussed in Section 9(g), the project site is not in an area designated as a 100-year flood hazard area.[39] The proposed project is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. 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?

Less Than Significant Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a significant impact may occur if a project exposes people or structures to a significant risk of loss

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[38] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed April 26, 2015.*

[39] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed April 26, 2015 and City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994.*

or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

The closest potential inundation area is located in the San Pedro Main Channel, located approximately 1,000 feet east of the project site. The project site is located close, but not within a potential inundation area.[40] As such, there impacts related to potential inundation from the failure of a levee or dam would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project site is located within an area susceptible to inundation by seiche, tsunami or mudflow. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, or lake. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The project site is located at least approximately one block from the San Pedro Main Channel. However, the project site is not located within a potential tsunami zone and risks associated with seiches or tsunamis would be considered extremely low at the project site.[41] The project site is located in a gently sloping area. However, the project is located in the highly urbanized San Pedro community of the City, and is not adjacent to any open space areas where mudflows could develop. Therefore, the potential for mudflows to impact the project site would also be highly unlikely. As such, impacts related to risk of loss, injury, or death by seiche, tsunami, or mudflow would be less than significant.

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 dense urbanized area. As discussed above, the project site and the surrounding area 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

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

[41] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed April 26, 2015 and City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994.*

to the surrounding street system. It is very likely that portions of the related project sites, similar to the project site, contain pervious surface area. The majority of existing single-family residential uses in the Los Angeles area are surrounded by yard space in the front and rear of each lot. Therefore, the development of the related projects and the proposed project would increase the amount of pervious surface area on the related project sites and there would be a cumulative increase in the amount of surface water runoff.

Similar to the proposed project, all the runoff associated with the related projects would be subject to the LID Ordinance. Therefore, runoff would either be directed to landscaped areas or directed to an existing stormdrain system and would not encounter unprotected soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain. Therefore, cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality and flooding impacts would be less than significant.

10. 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 or otherwise configured in such a way as to create a physical barrier within an established community. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

Physically dividing elements may include land use incompatibility caused by contrasting scale or land use. The project area is currently developed primarily with one-story to greater than 15-story uses. The proposed project would be similar in height to numerous land uses in the immediate project vicinity. The following analysis outlines the proposed project's consistency with existing surrounding land uses in terms of land use function, scale, and intensity.

The project site is located in an urbanized setting and is primarily surrounded by commercial buildings and surface parking lots. Other uses in the surrounding area include commercial and retail uses, institutional uses, and multi-family residential uses. The Harbor Village Shopping Center and surface parking are

located north of the site, across 5th Street. The 5-story Port of Los Angeles offices and Port of Los Angeles High School are located to the northwest across 5th Street. A fast food restaurant and hotel are located to the east of the site. A restaurant and commercial uses are located south of the site, across 6th Street. A 16-story multi-family residential building and 12-story Marymount University building are located directly to the west, across Palos Verdes Street.

The project site is one block to the east of the San Pedro Main Channel and ½ block east of John S. Gibson, Jr. Park, across S. Harbor Boulevard. The project site is located two blocks from the Los Angeles Port Police Headquarters, which is located at S. Center Street and 3rd Street. Fire Station #112 is located along the San Pedro Main Channel, north of 5th Street and south of the USS Iowa Museum.

San Pedro Plaza Park is located one block southeast of the project site. San Pedro City Hall and the Los Angeles County Mental Health offices are located on 7th Street. The Los Angeles Fire Department Harbor Museum is located in the San Pedro City Hall and the Los Angeles Maritime Museum is located to the east of the waterfront. The Battleship USS Iowa is docked across S. Harbor Boulevard and is open to the public. The World Cruise Terminal is located to the north of the USS Iowa Museum. Many boat slips line the San Pedro Main Channel.

The proposed project's six- to seven-story building would be consistent with the 5- to 16-story buildings in the immediate area, including along Palos Verdes Street and 5th Street. The building heights and massing that would be developed with the implementation of the proposed project would be compatible with the character of the surrounding area. Furthermore, the proposed project would consist of a residential use that is similar to the existing residential building in the area. As such, the proposed project would not cause a conflict of land use that would physically divide an existing community.

The proposed project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system that was developed prior to the 1920s. Since the proposed project would be developed within a long-established urban area along an existing street grid system, the proposed project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. The project would not create a conflict of scale, intensity, or use that would serve as a physical division. Since the project would not physically disrupt or divide the surrounding established community, there would be no impact.

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, 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.

According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site;
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

At the local level, the San Pedro Community Plan implements land use policies for the project site and vicinity. Other applicable City plans include the General Plan Framework. The LAMC governs land use at the project site through development and building standards. At the regional level, the Southern California Association of Government (SCAG) has prepared a Regional Comprehensive Plan and Guide (RCPG) that is a framework for decision-making with respect to regional growth and through its Growth Management policies addresses land use within a broader context. The consistency of the proposed project with the applicable policies of each of the aforementioned plans is addressed in the following discussion of plan compliance.

Southern California Association of Government - Regional Comprehensive Plan and Guide

The RCPG of the SCAG is a framework for decision-making with respect to regional growth to year 2020 and beyond, including growth management and regional mobility. Adopted policies related to land use are contained primarily in the Land Use and Housing section of the RCPG. The purpose of the Land Use and Housing section is to present policies related to land use and housing. These policies encourage local land use actions that could ultimately lead to the development of an urban form that would help minimize development costs, protect natural resources, and enhance the quality of life in the region. The proposed project would be consistent with Land Use and Housing goals and outcome policies of infill development, proximity to jobs, a development that would support walking and other alternative transportation, development in proximity to transit, and development in a location that would result in fewer environmental consequences. Therefore, project impacts are less than significant with respect to the policies of the RCPG.

General Plan

The City of Los Angeles General Plan is divided into several elements, including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation, and 35 Community Plans. As further described below, the project site is located within the San Pedro Community Plan area and designated as Regional Center under the Community Plan. The Framework Element of the General Plan (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy. Under the General Plan Framework, regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They are

typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services.[42] The proposed project would maximize the redevelopment potential with a new mixed-use multi-family and retail development with a 3.6 FAR reinforcing and enhancing the existing multi-family and commercial uses in the immediate area, which has access to several Metro, DASH, and Palos Verdes Peninsula Transit Authority bus lines located in the vicinity of the project site. Therefore, the proposed project would meet the General Plan Framework goal for designated regional center areas. Residential and retail uses are allowed in General Commercial areas. The General Plan Framework provides as a policy potential adjustment of density to reflect parcel size and configuration, intended functional role, and characteristics of surrounding uses determined through the community plan process as further delineated in the Community Plan and LAMC. The proposed project's 404 multi-family units would be consistent with this range. Impacts would be less than significant.

San Pedro Community Plan

The project site is located within the San Pedro Community Plan area. A Draft San Pedro Community Plan was issued in August 2012. However, the Draft Plan has not been adopted; therefore, the 1999 San Pedro Community Plan is still in effect. For completeness, this analysis includes a discussion of both the draft and adopted San Pedro Community Plans.

Within the Community Plan, the project site is designated as Regional Center Commercial. This land use designation corresponds with the C2-2 zoning classification and allows for a FAR of 6:1. As previously discussed, the proposed project would have an FAR of approximately 3.6, which is below the maximum allowed FAR. The proposed project would be consistent with the Community Plan designated zoning and FAR.

The project would meet the following goals and objectives of the 1999 San Pedro Community Plan:

- Designate specific lands to provide for adequate multi-family residential development;
- Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design;
- Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities, and topography will accommodate this development;
- Promote greater individual choice in type, quality, price, and location of housing;

[42] *The Citywide General Plan Framework Element, website: http://cityplanning.lacity.org/Framework.html.*

- Promote housing in mixed use projects in transit corridors and pedestrian oriented areas; and
- Provide for livable family housing at higher densities.

The project would meet the following goals and objectives of the 2012 Draft San Pedro Community Plan:

- Provide housing that accommodates households of all sizes, as well as integrates safe and convenient access to schools, parks, and other amenities and services;
- Developments should be sustainable and attractive, and incorporate green building design, systems and materials to the greatest extent feasible;
- Incorporate multi-family housing in areas targeted for mixed use and in the Regional Center;
- Provide an equitable distribution of housing types for all income groups throughout San Pedro's multi-family neighborhoods and promote mixed-income developments rather than creating concentrations of below-market-rate housing; and
- Include amenities for residents such as on site recreational facilities, community meeting spaces, and useable private and/or public open space in new multi-family development.

The proposed project would increase the housing supply to serve the needs of existing and future residents in the area. The proposed project would also be consistent with the goal of concentrating development in areas well-served by transit, as the project site is located in an area with extensive bus and transit opportunities. The proposed project would also reinforce the existing multi-family residential character of the surrounding areas on Palos Verdes Street.

Overall, the proposed project would be consistent with the existing commercial and multi-family land uses in the area. Project buildout would be of a scale and built form consistent with the surrounding area and would serve the housing needs of existing and possible future residents within the San Pedro Community Plan Area. The proposed project would be consistent with the land use goals of the San Pedro Community Plan that are applicable to the project site and surrounding area.

City of Los Angeles Municipal/Planning and Zoning Code

The proposed project would be consistent with the C-2-CDO zoning classification that is applicable to the project site. The C-2-CDO zoning allows all residential uses as allowed under R-5 zoning. The R-5 zoning allows a density of one dwelling unit per 200 square feet of lot area, which for the project site would permit a maximum of 534 dwelling units. The project proposes 404 dwelling units, which is below the maximum permitted. The zoning also permits a maximum floor area ratio of 6:1 on the project site. The project proposes a floor area ratio of 3.6, which is below the maximum permitted.

There are no setbacks required for commercial uses in the C2 Zone. Yard requirements of the R4 Zone apply to the floor level of the first story used in whole or in part for residential purposes in the C2 Zone; however, no yard requirements apply to the residential portions of mixed-use buildings if such portions are used exclusively for residential uses, abut a street, and the ground floor is used for commercial uses or access to the residential potions of such buildings. Therefore, no setbacks are required for the portions

of the project abutting 5th Street, Palos Verdes Street and 6th Street. A code required setback would be provided for the portion of the Project developed with residential uses along the easterly property line.

The project must provide usable open space per dwelling unit at a rate of 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms and 175 square feet for each unit having more than three habitable rooms. Usable open space is defined as an area that is designed and intended to be used for active or passive recreation and may consist of private and/or common area. Based on the proposed unit mix, the project requires 43,200 square feet of open space and project proposes to provide 38,947 square feet of open space. The project includes four open air courtyards with a pool, multiple spas, seating areas, landscape plantings and trees, a fitness center and gym, resident lobbies and lounges, club room, recreation room, and private balconies.

For apartments, two parking spaces are required for units with more than three habitable rooms, 1.5 spaces are required for units with 3 habitable rooms, and one space is required for units with less than three habitable rooms. Based on the proposed unit mix, the residential use requires 618 spaces and the commercial use requires 21 spaces for 639 total required project parking spaces. The project proposes to provide a total of 641 parking spaces.

As part of its approval of the Site Plan Review application, the City is required to adopt specific findings based on substantial evidence that that the proposed project complies with the zoning code, is consistent with the General Plan and is or would be compatible with existing and future development on neighboring properties (LAMC Section 16.05F).

The project meets a number of goals, objectives, and policies in the San Pedro Community Plan including:

The project would meet the following goals and objectives of the 1999 San Pedro Community Plan:

- **Policy 1-1.1.** Designate specific lands to provide for adequate multi-family residential development;
- **Policy 1-1.4.** Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design;
- **Policy 1-2.1.** Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities, and topography will accommodate this development;
- **Policy 1-5.1.** Promote greater individual choice in type, quality, price, and location of housing;
- **Policy 1-5.2.** Promote housing in mixed use projects in transit corridors and pedestrian oriented areas; and
- **Policy 1-5.5.** Provide for livable family housing at higher densities.

The proposed project is located within a high-density residential and commercial neighborhood that will not displace or encroach into a single-family neighborhood. The project would replace commercial and surface parking lot uses and construct 404 new apartments within a contemporary attractive six- to seven-story building that will include several resident amenities such as a fitness center and central courtyard with pool and spas. To encourage reduction in automobile trips, the project would include bicycle storage for 451 bicycles.

The project site is served by Metro Local Line 205 and Metro Express 550, which run on S. Harbor Boulevard and 7th Street and by Metro Local Line 246 and Metro Express 450, which run on S. Harbor Boulevard and S. Pacific Avenue. The project site is also served by LADOT DASH lines—Commuter Express 142, which connects with the Metro Blue Line in Long Beach and the San Pedro Dash, which provides local service, on S. Center Street. The Palos Verdes Peninsula Transit Authority runs the GRE, GR, O, and 226 lines from Palos Verdes to San Pedro. Therefore, the project will reduce vehicle trips and encourage public transportation ridership and project occupants will have easy access to the major transit corridor and a major transit station. The location near major transit options will provide residents of the project with a range of viable public transportation choices.

In addition, on March 13, 2013, the Bicycle Parking Ordinance became effective, which increases the levels of bicycle parking required under the current code for new developments; defines acceptable locations for bicycle parking; requires that both short-term and long-term bicycle parking be provided; and sets design standards. Under the Bicycle Parking Ordinance, the project would be required to provide 445 bicycle spaces for residential uses and 4 bicycle spaces for commercial/retail uses. The project would provide 451 residential and 6 retail spaces. Therefore, the proposed bicycle parking complies with the Bicycle Parking Ordinance.

The Downtown San Pedro Community Design Overlay

The Downtown San Pedro Community Design Overlay (CDO) District provides guidelines and standards for development projects, including new development and improvements to existing properties, within Downtown San Pedro. The intent of the Downtown San Pedro CDO is to provide design guidance and direction to enhance the visual identity and to improve the walkability and appearance of the Downtown.

Building Orientation and Frontage

- Includes 5,200 square feet of neighborhood serving retail uses along 6th Street with pedestrian oriented entryways, an outdoor plaza, and transparent storefront glass that would improve the pedestrian experience along 6th Street.
- Two plazas at the corners of 6th and Palos Verdes and 5th and Palos Verdes that provide entrances to residential lobbies.
- Façade along Palos Verdes and 5th Street would contain apartment units at the ground floor with individual balconies overlooking the street.

- Parking for the project would be located within three subterranean parking levels which access located along the side of the subject site that would not be visible from the surrounding public streets.

Setbacks

- The proposed building provides a continual streetwall along 5th Street, 6th Street, and Palos Verdes Avenue.
- Neighborhood serving retail space is located along 6th Street with a plaza located at the corner of 6th and Palos Verdes.
- Palos Verdes is lined with apartment units with individual entrances from the street and ground floor apartment units are slightly recessed from the property line to accommodate patios and landscape planted areas.
- A second plaza at ground level is located at 5th Street and Palos Verdes adjacent to a resident lobby, business center, and leasing offices fronting along Palos Verdes.

Views

- The project site would be developed with a six- to seven-story mid-rise building that would not change significant views to the harbor waterfront and would not block the established 6th Street view corridor.

Open Space

- Design includes two plazas located at the ground level at end of the Palos Verdes Street that include architectural elements, columns, hardscape, and seating areas to create a usable, inviting space for both visitors and residents of the project.
- The project proposes four large courtyard spaces at the second level that include landscaping, water features, a pool, spa, shade structures, and seating areas for residents to relax and congregate. Two rooftop decks are also proposed that provide additional open space for residents.

Parking and Vehicular Access

- All required parking for the project's residential and commercial uses is proposed within three subterranean parking levels.
- The project avoids pedestrian conflicts and minimizes curb cuts by locating the entrances to underground parking on the easternmost portions of the subject property so that all of Palos Verdes Street and majority of 5th and 6th Streets would have a continuous sidewalk.

Building Massing

- The building has been modulated in both plan and section to reduce the overall massing and scale.
- The building has been modulated by massing and color changes.
- Visual monotony of the building is reduced by creating the appearance of multiple structures of varying size

Building Scale

- To create a pedestrian scale on the ground floor of a building, the building's first floor height of any structure is 12 feet.

Articulation

- The building façades, including the ground floor are modulated and articulated with vertical elements.
- Building incorporates three-dimensional elements and material variation into the façade
- Building facades are modulated and articulated to create interest and variety.
- The building base is differentiated from the rest of the building façade.
- Windows and doors allow views into building interiors and/or to merchandise displays; transparent, non-reflective glass shall be used.

Exterior Surface Materials

- The texture of the building facades are complementary to other buildings in the surrounding area and use varied building material to reduce the mass of the building and to create visual interest.
- The exterior facade of the building incorporates no more than three complementary building materials.
- Building employs materials that create an interesting variety of facades to reduce massiveness and glare impacts on surrounding uses and motorists.

Entrances

- Project emphasizes pedestrian orientation and accessibility by creating well-articulated and inviting building entrances, and by orienting these entrances towards the street.
- Each individual tenant or business space located on the ground floor has an entrance directly accessible from the street at the same grade as the sidewalk.
- Ground floor units are directly accessible from the street.

Windows

- Building uses clear and non-reflective glass allowing a minimum of 90 percent light transmission.

- Residential units with individual entrances include windows at the ground level.
- Windows on levels above the ground floor are evenly and regularly spaced to create a discernible rhythm.

Security Grilles

- No security grilles and bars are proposed that would be as visible from the street.
- Building employs non-barrier (alarm or sensor) theft-deterrent systems.

Utility & Service Areas/ Mechanical Equipment

- Utilities, storage areas, trash bins, air conditioning units, fire alarms, and similar equipment would be located and designed as to be as inconspicuous as possible.
- All exterior mechanical equipment, including HVAC equipment, satellite dishes, cellular antennas will not be visible from public rights-of-way.
- Rooftop mechanical equipment will be screened with materials that are architecturally integrated into the building.

Lighting

- Lighting is incorporated into the design to accentuate architectural features and provide a safe environment for pedestrian activity.
- All open areas will have security lighting for safety.

Landscaping

- Building includes courtyards and roof decks that provide shade and careful placement of landscaping.
- Landscaping includes as trees, shrubs, ground covers, perennials, annuals, as well as water features,
- 80% of landscaped areas consist of plant materials.
- Incorporates drought-tolerant, California native
- Project includes an automatic irrigation system.

Resource Protection

- Proposed courtyards have been oriented to the eastern sun to minimize the need for artificial lighting, cooling, and heating.
- Project design to comply the California Green Building code.
- Building employs high-performance glazing.

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

No Impact. Although not specified in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project-related significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the project site. Furthermore, the project site is located in an area which is already fully developed with residential, commercial, and retail uses, and is also within a heavily urbanized area of the City of Los Angeles. Therefore, the proposed project would not have the potential to cause such effects and there would be no impact.

Cumulative Impacts

No Impact. Development of any related projects is expected to occur in accordance with adopted plans and regulations. Overall, the San Pedro Community Plan area is experiencing an increase in density as more multi-family housing is constructed. However, 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, no cumulative land use impacts are anticipated.

11. MINERAL RESOURCES

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

No Impact. As described in the *L.A. CEQA Thresholds Guide, 2006*, "underlying the City of Los Angeles are finite deposits of non-renewable mineral resources, including petroleum and natural gas, limestone, and aggregate (e.g., rock, sand, and gravel). Development that includes placement of structures over resource areas or blocks access to a resource area results in the loss of availability of resources. Impacts are related to the characteristics of the resource and the degree of loss.

Federal, State and City agencies regulate or have documented the presence of mineral resources. The State Geologist, California Division of Mines and Geology (CDMG), and State Mining and Geology Board (SMGB) provide assistance and direction with regard to mineral resources. The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. Projects located within the MRZ-2 designation are subject to City policies established in Section VII, Mineral Resources, of the Conservation Element."

Therefore, a significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if a project development would convert an existing or future regionally-important mineral extraction use to another use, or if a project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, a 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
- 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 fully developed and no oil wells are present on the project site or proximate to the project site.[43] According to the Department of Conservation, there is no active oil drilling nearby the project site.[44] According to the City General Plan Conservation Element Exhibit A, the project site is not located near or in a mineral resources zone. Therefore, no impacts would occur with implementation of the proposed project.

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. As noted above, according to the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

Because the project site is subject to the applicable land use and zoning requirements in LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. The project site is not zoned for oil extraction and drilling or mining of mineral resources, and there are no such operations

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[43] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed April 25, 2015.*

[44] *California Department of Conservation, Division of Oil, Gas & Geothermal Resources Well Finder, website: http://maps.conservation.ca.gov/doggr/index.html#close, accessed April 25, 2015.*

at the project site.[45] Therefore, development of the proposed project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur.

Cumulative Impacts

No Impact. As discussed above, the proposed project would have no impact on mineral resources. It is not known if any related projects would result in the loss of availability of known mineral resources. Regardless, 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.

12. NOISE

Construction Noise

Construction-related noise impacts 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. Additionally, as defined in the L.A. CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the project would require the use of heavy equipment for demolition, grading, excavation and foundation preparation, the installation of utilities, 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

[45] *City of Los Angeles Department of City Planning, Parcel Profile Report, 550 S. Palos Verdes and 140-160 W 6th Street, website: www.zimas.lacity.org, accessed April 25, 2015.*

presented in Table III-9, Noise Range of Typical Construction Equipment, and Table II-10, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table III-9
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.

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. As shown in Table III-10, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of 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.

For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor. Construction activities associated with the project would be expected to occur and generate noise at off-site locations consistent with the estimates provided in Table III-10.

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 a project would not comply with the Sound Transmission Control requirements of Title 24 of the California Code of Regulations, the City of Los Angeles General Plan Land Use Compatibility Standards for Noise, or the City of Los Angeles Noise Ordinance.

As shown in Figure III-1, Noise Monitoring and Sensitive Receptor Location Map, the nearest sensitive receptors that could potentially be subject to noise impacts associated with construction of the project include the hotel use to the east, a Boys & Girls Club with daycare use to the north, a high school to the northwest, residential uses to the west, a college use to the west, hotel use to the southwest, and residential uses to the southwest.

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Figure III-1
Noise Monitoring and Sensitive Receptor Location Map

To identify the existing ambient noise levels in the general vicinity of the project site, noise measurements were taken with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1. Additionally, this noise meter meets the requirement specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications.

At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The measured noise levels are shown in Table III-11, Existing Ambient Noise Levels in project site vicinity. Due to the use of construction equipment during the construction phase, the project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those previously listed above in Table III-10. Specifically, Table III-12, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, shows the peak estimated construction noise levels that could occur at the nearest sensitive uses during construction of the project.

Table III-11
Existing Ambient Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Levels[a]		
			L_{min}	L_{max}	L_{eq}
1	East of Project Site, adjacent to off-site hotel.	Traffic and pedestrian activity along 5th, 6th St. and S. Palos Verdes St., surface parking and alley activities, and light/intermittent construction activity 300 feet east.	45.3	70.9	57.9
2	Northwest corner of 5th St. and S. Palos Verdes St.	Traffic and pedestrian activity along 5th St. and S. Palos Verdes St.	45.9	80.8	61.9
3	West side of S. Palos Verdes St., across from Project Site.	Traffic and pedestrian activity along S. Palos Verdes St.	47.7	77.7	58.8
4	Southwest corner of 6th St. and S. Palos Verdes St., adjacent to off-site hotel.	Traffic and pedestrian activity along S. Vermont Ave. and Wilshire Blvd.; bus stop activity.	55.0	79.0	64.1

[a] Noise measurements were taken on April 10, 2015 at each location for a duration of 15 minutes.
See Appendix F to this Draft IS/MND for noise data.

Table III-12
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

Sensitive Land Uses[a]	Distance to Project Site (feet)	Existing Monitored Ambient Noise Levels (dBA L_{eq})	Estimated Peak Construction Noise Levels (dBA L_{eq})	Noise Level Increase
1. Hotel to east	45	57.9	86.9	29.0
2. Boys & Girls Club With Daycare to north	160	61.9	75.9	14.0
3. High School to northwest	370	61.9	68.6	6.7
4. Residential uses to west	50	58.8	86.0	27.2
5. College to west	50	58.8	86.0	27.2
6. Hotel to southwest	90	64.1	80.9	16.8
7. Residential uses to southwest	400	64.1	67.9	3.8

[a] See Noise Monitoring and Sensitive Receptor Location Map in Appendix F to this Draft IS/MND. 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.

As shown in Table III-12, the construction noise levels forecasted for the proposed construction work during each phase of development associated with the project would result in noise increases at the identified sensitive receptors. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., demolition and grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

As discussed previously and illustrated above, typical construction noise levels associated with the project could exceed 75 dBA at 50 feet from the project site. As defined in the Los Angeles CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities at the project site would last for more than ten days in a three-month period, the project would cause a significant noise impact during construction if the ambient exterior noise levels at

the identified sensitive receptors would be increased by 5 dBA or more. Based on the results shown in Table III-12, the ambient exterior noise levels at Sensitive Receptors 1 through 6 could be exceeded by 5 dBA or more. Thus, based on criteria established in the L.A. CEQA Threshold Guide, a substantial temporary or periodic increase in ambient noise levels could occur at the identified off-site sensitive receptors.

LAMC Section 41.40 regulates noise from construction activities. Exterior 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. Demolition and construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented.

Although the estimated construction-related noise levels associated with the project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in LAMC Section 112.05, and the typical construction noise levels associated with the project would exceed the existing ambient noise levels at the identified off-site sensitive receptors by more than the 5 dBA threshold established by the L.A. CEQA Thresholds Guide during construction, implementation of the following mitigation measures would reduce the noise levels associated with construction of the project to the maximum extent that is technically feasible. Specifically, the use of barriers such as plywood structures, flexible sound control curtains, or intervening construction trailers, could reduce line-of-sight noise levels by approximately 10 dbA.[46]

Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measure XII-20 would 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.

Mitigation Measures

XII-20 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted 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.

[46] *Based on a review of Table 4 of the FHWA Noise Barrier Design Handbook (July 14, 2011) , the design feasibility of a sound barrier that reduces noise by 5 dBA is considered "simple" and a reduction of up to 10 dBA as "attainable." And, reductions of 15 and 20 dBA are considered "very difficult" and "nearly impossible," respectively.*

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- A temporary noise control barrier shall be installed on the property line of the construction site abutting residential uses. The noise control barrier shall be engineered to reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10dBA. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all activities on the project site are complete.

Operational Noise

Upon completion and operation of the project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the new structure. 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 uses on the project site or adjacent buildings in the project vicinity. As such, the HVAC equipment associated with the 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. This impact would be considered less than significant.

In order to ensure that on-site residences would not be adversely impacted by elevated ambient urban noise levels and operations of mixed-uses on-site, Mitigation Measure XII-60 shall be implemented to ensure that dwelling units associated with the 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. Furthermore, implementation of Mitigation Measure XII-60 would require that the project Applicant submit evidence to the City's Department of Building and Safety of a means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room of the project. With implementation of Mitigation Measure XII-60, impacts associated with interior noise levels at the proposed residences would be less than significant.

Mitigation Measures

XII-60 Increased Noise Levels (Mixed-Use Development)

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

b) Would the project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne 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, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while 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

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though 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. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate

potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[47]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table III-13, 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-13, 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.

[47] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.*

Table III-13
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.

With respect to construction vibration impacts upon existing off-site structures, there are no historical buildings or buildings that are extremely susceptible to vibration damage within 25 feet of proposed heavy construction activity. As shown in Table III-13 above, at distances beyond 25 feet from the project site boundary, construction related vibration levels would not have the potential to exceed 0.089 PPV.

As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage, and the least restrictive threshold is 0.5 PPV at any building that is constructed with reinforced-concrete, steel, or timber. As maximum off-site vibration levels at existing structures would not have the potential to exceed 0.089 PPV, the project's construction activities would not exceed the identified thresholds of significance for building damage from vibration. As such, impacts with respect to building damage upon off-site structures would be less than significant.

In terms of human annoyance resulting from vibration generated during construction, the sensitive receptors located in the vicinity of the project site could be exposed to increased vibration levels. Table III-14, Estimated Vibration Levels at Nearest Sensitive Receptors, shows that construction-generated vibration levels experienced at the identified sensitive receptors would not exceed the 80 VdB residential/hotel annoyance threshold at any of the residential or hotel uses. The 83 VdB institutional annoyance threshold would not be exceeded at the high school or college receptors.

It should be noted that much of the construction work would be conducted away from the property lines and vibration levels experienced in the project vicinity would be reduced when the construction activities are located toward the center of the project Site. Furthermore, consistent with LAMC Section 112.05, construction vibration levels would be considered exempt from the threshold if all technically feasible noise attenuation measures are implemented.

Mitigation Measure XII-20 provided for construction noise would also serve to reduce construction related vibration levels to the maximum extent feasible.

Table III-14
Estimated Vibration Levels at Nearest Sensitive Receptors

Sensitive Land Uses	Distance to Project Site (feet)	Estimated Vibration Levels (VdB)
1. Hotel to east	45	79.3
2. Boys & Girls Club With Daycare to north	160	62.8
3. High School to northwest	370	51.9
4. Residential uses to west	50	77.9
5. College to west	50	77.9
6. Hotel to southwest	90	70.3
7. Residential uses to southwest	400	50.9
Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.		

Operational Vibration

The project involves the construction and operation of apartments and a retail use and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Groundborne vibrations at the project site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the project site would not result in a substantive increase 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 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 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?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. As defined in the City of Los Angeles CEQA Thresholds Guide threshold 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-15, 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 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 Leq standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table III-15
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 Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the L.A. CEQA Thresholds Guide, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

As detailed in the project's traffic impact study, the project is estimated to generate 2,738 net daily trips, including 191 morning peak hour trips and 239 afternoon peak hour trips. As shown in greater detail in the project's traffic study, the highest project-related trip increase would occur at intersection number #14 (S. Harbor Blvd. & 5th St.) during the PM peak hour with 116 peak hour trips. When compared to the existing 1,996 vehicle trips occurring at intersection number 14 during the PM peak hour, it is clear that the proposed project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the project site. As such, the proposed project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed buildings at the project site. As discussed in Question 12(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

Parking Noise

Noise would be generated by activities within the proposed subterranean parking levels. Sources of noise within the parking areas would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. It is anticipated that parking related noise would be substantially similar to the existing noise generated by the existing surface parking lot on the project site, existing street parking and roadway activity, and existing surface parking lots in the project site vicinity. Proposed parking would be contained within the parking garage and would not be visible from off-site locations. As such, parking related noise under the project may actually be reduced compared to the noise generated from the existing open-air surface parking areas on site. In addition, parking-related noise generated by motor driven vehicles within and around 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. With implementation of Mitigation Measure XII-40, noise impacts associated with the project's subterranean parking garage would be less than significant.

Mitigation Measures

XII-40 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

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. As discussed above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration. The implementation of Mitigation Measures XII-20, -60 and-40 would ensure the project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, and these 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 expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact would occur if the project site was located within the noise impact area of a public airport land use plan or within two miles of a public use airport and would expose students and people working in the project area to excessive noise levels from aircraft operations.

Although the project site is subject to occasional over flights from jet and propeller aircraft, it is not located within the noise impact area of a public airport land use plan or within two miles of a public use airport. The nearest airport to the project site is the Torrance Municipal Airport, located approximately 5 miles to the northwest. In addition, the project site is not located within an airport land use plan or within the vicinity of a private airstrip. As such, the proposed project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if a project were in the vicinity of a private airstrip and would project students and workers to excessive noise levels from aircraft operations.

The nearest airport to the project site is the Torrance Municipal Airport, located approximately 5 miles to the northwest. In addition, the project site is not located within an airport land use plan or within the vicinity of a private airstrip. As such, the proposed project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

Cumulative Impacts

Development of the proposed project in conjunction with the related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in an already urbanized area of the City of Los Angeles. The project Applicant has no control over the timing or sequencing of the related projects that have been identified within the proposed project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the proposed project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the extent feasible. With respect to cumulative traffic noise impacts, it should be noted that the proposed project's mobile source vehicular noise impacts are based on the predicted future traffic volumes as presented in the project Traffic Study. Based on the proposed project's estimated trip generation, it is clear that the project would not have the potential to double the traffic volumes on any roadway segment or study intersection in the vicinity of the project site. As such, the proposed project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with noise would be less than significant.

13. POPULATION AND HOUSING

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering the following factors:

- 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;

- Whether a project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and

  The extent to which growth would occur without implementation of a project.

As part of its comprehensive planning process for the Southern California region, SCAG has divided its jurisdiction into 14 subregions. The project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. The City of Los Angeles population and housing for 2012 were 3,825,297 residents and 1,418,581 total residential units.[48] SCAG's Draft Local Profile Report estimates 2014 population and housing as 3,899,323 persons, a 1.9 percent increase, and 1,432,553 residences, a 1.0 percent increase.[49]

Population

No permanent employment would be generated as a result of the construction of the proposed project, as the proposed project would generate temporary construction-related jobs. In particular, most construction projects of this size and nature are completed in a timely manner and require specialized workers at various time frames, as needed. As a result, project-related construction workers are not likely to relocate to the area as a consequence of working on the proposed project.

The project includes approximately 5,200 sf of retail uses. These uses would generate a limited amount of jobs and it is not anticipated that there would be an increase of population in the area related to the provision of jobs created by the project.

Based on the most recent City estimates for the San Pedro Community Plan Area, the average household size for dwelling units is 2.56 residents per multi-family unit.[50] The proposed project would include 404 new units and result in an increase of 1,034 residents. The addition of 1,034 residents represents 1.4 percent of the total increased resident population estimate for the City of Los Angeles in 2015 or 0.025 percent of the total City population. This would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. In addition, the designation of the project site and vicinity for Regional Center development indicates an expectation that growth would occur in the San

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[48] *SCAG, Profile of the City of Los Angeles, May 2013 website: http://www.scag.ca.gov/Documents/LosAngeles.pdf.*

[49] *SCAG, (DRAFT) Profile of the City of Los Angeles, May 2015 website: http://www.scag.ca.gov/DataAndTools/Documents/Draft2015LP/LosAngeles.pdf, accessed April 25, 2015.*

[50] *Los Angeles Department of City Planning, City of Los Angeles 2009 Population Estimate, Community Plan Area: San Pedro Community, website: http: http://planning.lacity.org/DRU/StdRpts/StdRptscp/StdRptcpSPd.pdf, accessed April 25, 2015.*

Pedro Community Plan area over time. As such, population growth associated with the proposed project would be less than significant.

Housing

With respect to housing, the proposed project would introduce a total of 404 multi-family residential units to the City of Los Angeles. These 404 dwelling units would represent approximately 2.9 percent of the overall estimated increase in housing units for 2015 based on SCAG statistics. This increase would not be considered a substantial increase in housing for the area because the addition of the 404 new housing units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the proposed project would be less than significant.

The proposed project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the proposed project would not indirectly induce population growth. Because the proposed project is consistent with General Plan and the San Pedro Community Plan, it would not introduce unplanned infrastructure not previously evaluated in those plans.

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

No Impact. For the purpose of this Initial Study, a significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- A net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means; or
- A net loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means.

The proposed project site is currently in use with commercial buildings and surface parking; therefore, development of the proposed project not would result in the displacement of residential units from the project site and no impact would occur.

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

No Impact. For the purpose of this Initial Study, a project-related significant adverse effect could occur if a project would result in the displacement of a substantial amount of people. Based on the City of Los

Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- A net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means; or
- A net loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means.

The proposed project site is currently in use commercial buildings and surface parking; therefore, development of the proposed project not would result in the displacement of any people/tenants from the project site and no impact would occur.

The proposed project would not involve or cause construction of replacement housing elsewhere. Pursuant to Public Resources Code section 21082.2(c) (CEQA Guidelines section 15064(e)), no substantial evidence exists between the project and the direct or indirect need to construct new housing elsewhere in the City of Los Angeles. The proposed project would provide a net increase in the City's housing stock.

Cumulative Impacts

Less Than Significant Impact. The City of Los Angeles population and housing for 2012 were 3,825,297 residents and 1,418,581 total residential units.[51] SCAG's Draft Local Profile Report estimates 2014 population and housing as 3,899,323 persons, a 1.9 percent increase, and 1,432,553 residences, a 1.0 percent increase.[52] The proposed project would provide 404 permanent dwelling units, which would represent a small portion of the approximate capacity in the City of Los Angeles. Related projects consisting of past, present, and reasonably probable future residential projects in the Los Angeles area would result in additional apartment and condominium units (see Section II, Project Description, Table II-3, Related Projects). The cumulative total increase in residential units would be consistent with the San Pedro Community Plan. Therefore, cumulative impacts would be less than significant.

14. PUBLIC SERVICES

Would a 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 objectives for any of the following public services:

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[51] *SCAG, Profile of the City of Los Angeles, May 2013 website: http://www.scag.ca.gov/Documents/LosAngeles.pdf.*

[52] *SCAG, (DRAFT) Profile of the City of Los Angeles, May 2015 website: http://www.scag.ca.gov/DataAndTools/Documents/Draft2015LP/LosAngeles.pdf*

a) Fire protection?

Potentially Significant Unless Mitigation Incorporated. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The project site is within the service area of LAFD Division 2, Battalion 6,[53] which covers the communities of San Pedro, Wilmington, and Harbor City. Nine fire stations (Fire Stations 36, 40, 48, 49, 85, 101, 110, 111, and 112) are under the command of Battalion 6.[54]

The proposed project would be served primarily by Fire Station No. 48, located at 1601 S. Grand Avenue, approximately 1.2 mile southwest of the project site. Fire Station No. 112, located at 4444 South Harbor Boulevard, Berth 86; Fire Station No. 111, located at 954 South Seaside Avenue, Berth 260; and Fire Station No. 110, located at 2945 Miner Street, Berth 44-A; Fire Station 101, located at 1414 25th Street; Fire Station 85, located at 1331 West 253rd Street; Fire Station 49, located at 400 Yacht Street, Berth 194; Fire Station 40, located at 330 Ferry Street; and Fire Station 36, located at 1005 North Gaffey Street would also serve the project site. Under LAMC criteria, the existing fire response distance to the project would be adequate.

The required fire flow is closely related to the type and size of land use. Under the Los Angeles Fire Code, this project would be reviewed as residential occupancy, consistent with other types of residential uses near the project site. Therefore the hydrant flow requirements would be based on fire flow figures for Medium-Density Residential Uses. The minimum fire flow requirements for the proposed project would be at least 6,000 gallons per minute (gpm) flowing from four fire hydrants at the same time, however this figure is subject to a field inspection of the general area as well as the proposed development and could potentially increase by 2,000 to 8,000 gpm. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. As previously noted, the proposed project conservatively is anticipated to generate 1,034 permanent residents. As such, the

[53] *Los Angeles Fire Department Map 105, January 12, 2015.*

[54] *Los Angeles Fire Department, Find Your Station, website http://lafd.org/fire_stations/station_results/%2A?zipcode=90731, accessed May 25, 2015.*

proposed project could incrementally increase the demand for LAFD services; however, it is not anticipated to increase service ratios, response times, or other performance objectives to the extent that substantial adverse physical impacts would result from the construction of new or physically altered fire facilities. Any potential changes in existing hydrants along the project frontage would be reviewed by the LAFD prior to site plan approval. Standard LAFD regulations, including access, fire flow and fire prevention measures would be applied to the project by the LAFD and the City Planning Department.

Construction staging for the proposed project is not anticipated to block adjacent roadways and would not interfere with LAFD access to the site or surrounding properties. The proposed project would comply with all applicable provisions in the City of Los Angeles Fire and Building Codes. Additionally, the City requires implementation of Standard Mitigation Measures (shown below) to ensure the requisite fire flow for the project site. Further, the location and number of any new private hydrants would be determined as part of LAFD's review of the project plans. Therefore, through compliance with the City's Standard Mitigation Measures, impacts on fire flow would be less than significant.

Additionally, the proposed project would include installation of fire sprinkler alarm systems that would be connected to a supervised National Fire Protection Agency (NFPA)-13 automatic fire sprinkler system.

Since the proposed project would be within a 1.5 mile fire response distance, provide adequate fire flow and access, and meet building fire safety regulations, impacts with respect to fire services would be less than significant. However, to ensure that impacts remain less than significant Mitigation Measure XIV-10 is required.

Mitigation Measures

XIV-10 Public Services (Fire)

> The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit 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 or approved fire lane.

Cumulative Impacts

Less Than Significant Impact. The proposed project, in combination with the related projects would increase the demand for fire protection services. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing

mechanisms (e.g., property taxes, government funding) to which the proposed project and related projects would contribute. On this basis, it is anticipated that cumulative impacts to fire protection would be less than significant.

b) Police protection?

Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, 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. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and a project's proportional contribution to the demand; and

  Whether a project includes security and/or design features that would reduce the demand for police services.

The proposed project would be served by the LAPD Harbor Community Police Station located at 2175 John S. Gibson Boulevard, approximately 1.7 miles southeast of the project site. The Harbor Community Police Station is under the jurisdiction of the South Bureau. The South Bureau oversees operations in the following areas: Harbor, 77th Street, Southeast and Southwest, as well as the South Traffic Division. The South Bureau has a population of roughly 640,000 people, encompasses 57.6 square miles.[55] The Harbor Area has a population of approximately 171,000, encompasses 27 square miles, the largest area in South Bureau, and is home to four distinct communities: San Pedro, Wilmington, Harbor City and the Harbor Gateway. For the purposes of the LAPD, the Harbor Community boundaries are roughly defined as: the Artesia Boulevard and SR 91 to the North, San Pedro shoreline to the South, the City of Los Angeles and the City of Rancho Palos Verdes boundary to the West and Navy Way in the Port of Los Angeles to the East.

Implementation of the proposed project would result in an increase of site visitors and residents within 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 would be anticipated to occur as a result of the increased on-site activity and increased traffic on

[55] *LAPD website: http://www.lapdonline.org/south_bureau/content_basic_view/1938, accessed May 28, 2015.*

adjacent streets and arterials. According to the LAPD, a project of this size could have a moderate impact on police services in the Harbor Area.[56] With the addition of the proposed project's on-site activity, the resident/officer ratio in the South Bureau would be reduced. The demand for police services is based on residential population and it assumed the proposed project would introduce approximately 1,034 residents to the project site. Since the ratio of residents per officer is approximately 900, the addition of 1,034 residents would create the demand for one additional officer.

Under the conservative assumption that the proposed project would require the addition of one officer to maintain the existing service level in the Harbor Community Police Station service area, it is not anticipated that the addition of one officer would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Nonetheless the construction of a project of this size could have a significant impact on police services in the Harbor Area. Therefore, the proposed project would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. With implementation of Mitigation Measure XIV-30, the proposed project's impact would be reduced to a less-than-significant level. As described in the mitigation measure, 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. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive.

Additionally, the proposed project would be subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Upon completion of the proposed project, the Harbor Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to the project site.

Mitigation Measure

XIV-30 Public Services (Police)

> The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through

[56] *Andrew J. Smith, Commanding Officer, LAPD. Personal communication to Katrina Hardt-Holoch, June 22, 2015.*

Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Cumulative Impacts

Less Than Significant Impact. Construction of the proposed project in conjunction with the related projects would result in an increase in the demand for police services. The related projects would increase the police service population in the Harbor Area. Additionally, the proposed project, in combination with the related projects, would increase the demand for police services associated with commercial and retail uses. This cumulative increase in the police service population would be expected to increase demand for additional LAPD staffing, equipment, and facilities over time. As with the proposed project, related projects would implement safety and security features according to LAPD recommendations. If arrest rates and level of demand drop due to the implementation of on-site safety measures, fewer officers may be required since the potential for crimes per population may decrease. Furthermore, any required additional staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which the proposed project and related projects would contribute. Therefore, the cumulative impact with respect to police services would be less than significant.

c) Schools?

Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, 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). Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on public schools shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- 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 a project's proportional contribution to the demand;
- 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

- Whether a project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The proposed project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. As shown in Table III-16, the project site is currently served by Cabrillo Elementary, Dana Middle, and San Pedro High Schools.[57] Cabrillo Elementary and San Pedro High are currently operating at over capacity.

Table III-16
Project Area School Enrollment and Capacities

	Current Capacity	Resident Enrollment	Current Seating (Overage/Shortage)[a]	Overcrowded Now	Overcrowded Future
School					
Cabrillo Elementary	530	595	(65)	Y	Y
Dana Middle School	1,765	1,375	390	N	N
San Pedro High School	2,898	3,015	(117)	Y	Y
LAUSD, April 24, 2015.764					

Enrollment and capacity data provided by LAUSD take into account portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools. LAUSD is not planning any schools that would relieve overcrowding in the project school service area. Therefore, even taking into account the potential for operational and educational programming changes to increase capacity, Cabrillo Elementary and San Pedro High would continue operating at over capacity.

As shown in Table III-17 (Estimated Proposed Project Student Generation), below, based on 2008 LAUSD student generation rates for multi-family residential land uses, the proposed project would generate an increase of approximately 51 elementary students, 4 middle school students, and 1 high school students, for a total increase of approximately 56 students.

[57] *Los Angeles Unified School District. Personal communication to Katrina Hardt-Holoch, May 3, 2015.*

Table III-17
Estimated Proposed Project Student Generation

	Size (du)	Elementary School Students [a]	Middle School Students [a]	High School Students [a]	Total Students [b]
Proposed Project					
Multi-Family Residences	404	51	4	1	56
				Total Student Generation	***56***

Note: du = dwelling unit.
[a] *Based on LAUSD student generation rates for multi-family residential uses: 0.1266 elementary, 0.0692 middle and 0.0659 high school students per dwelling unit. LAUSD, Student Generation Rate Calculation, September 2008.*
[b] *The number of students has been rounded to the nearest whole number.*

Although it is likely that some of the students generated by the proposed project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the proposed project would be new to the school district. As previously discussed, Cabrillo Elementary and San Pedro High are operating above capacity. Dana Middle School is not operating over capacity and the addition of 4 new middle school students by the proposed project would not create an impact. However, the addition of 51 new elementary students and 1 new high school student to Cabrillo Elementary and San Pedro High would result in those schools surpassing their capacity for students. As such, the increase of 56 new students to the school district would constitute a substantial increase in student populations to the area that would exceed the capacity in the LAUSD and potentially cause the construction of new or expanded school facilities. Therefore, impacts on the schools identified to serve the proposed project would be significant.

The open enrollment policy is a State-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.[58]

Pursuant to the California Government Code Section 17620, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed project's direct and indirect impacts on schools.

The closest school to the project site is the Port of Los Angeles High School, located approximately 400 feet northwest of the project site. The project would require hauling near a school site, which would

[58] *News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.*

impact student safety or school operations. Therefore, to reduce impacts to the Port of Los Angeles High School from project hauling, Mitigation Measure XIV-50 is required.

Mitigation Measure

XIV-50 Public Services (Schools affected by Haul Route)

- LADBS shall assign specific haul route hours of operation based upon Port of Los Angeles High School hours of operation.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

Cumulative Impacts

Less Than Significant. The proposed project would generate approximately 56 new students. As a result of the development of the proposed project in combination with the related projects, it is anticipated that a cumulative increase in the demand for school services would occur. The evaluation of related project's impacts on schools would be conducted on a project-by-project basis in conjunction with each individual project proposal. It is likely that some of the students generated by the related projects, which are comprised of commercial uses, would already reside in areas served by the LAUSD and be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all the students generated by the proposed project and the related projects would be new to the LAUSD.

At this point in time LAUSD does not have any schools planned for construction that would relieve this overcrowding and there is no excess capacity to house the projected student enrollment. Therefore, to be conservative, it is concluded that the LAUSD schools that would serve the proposed project and the related projects would operate over capacities with cumulative student generation, and new or expanded schools could be needed. However, as mandated by state law, the Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees which a developer may be required to pay to mitigate a project's impact on school facilities. As such, the applicants of the related projects, in addition to the proposed project, would be required to pay a school fee to the LAUSD to help reduce cumulative impacts on school services. Compliance with the provisions of SB 50 is deemed to provide full and complete mitigation of school facilities impacts. The proposed project as well as the related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

d) Parks?

Less Than Significant Impact. For the purpose of this Initial Study, 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. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a project;
- 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 a project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The proposed project would generate approximately 1,034 permanent residents. There are pocket, neighborhood, and regional parks serving the project site, including the following:[59]

Pocket parks (less than 1 acre):

- Gibson (John S., Jr.) Park, a 0.88-acre park located at 540 S. Harbor Boulevard.

Neighborhood parks (1-10 acres):

- Daniels (Ralph C.) Field Sports Center, a 3.59-acre neighborhood park located at 845 W 12th Street;
- Los Angeles Maritime Museum, a 2.48-acre special facility located at Berth 84 – Foot of 6th Street/Harbor Boulevard; and
- San Pedro Plaza Park, a 3.51-acre park located at 700 S. Beacon Street.

Regional parks (between 10-50 acres):

- Averill Park, a 10.77-acre park located at 1300 Dodson Avenue; and
- Cabrillo Beach, a 40.07-acre park located at 3800 Stephen M. White Drive;
- Gaffey Street Field of Dreams, a 17.80-acre park located at 501 W Westmont Drive; and
- Leland Park, a 15.76-acre park located at 863 S. Herbert Drive.

[59] *City of Los Angeles Department of Recreation and Parks. Correspondence with Michael A. Shull, Los Angeles Department of Recreation and Parks, dated April 24, 2015.*

Regional parks (over50 acres):

- Angeles Gate Park, a 70.44-acre park located at 3601 S. Gaffey Street; and
- Peck Park, a 74.52-acre park located at 560 N Western Avenue.

The project would be located in an area of the City that is below the City's standard for neighborhood and community park acreage. The San Pedro Community Plan Area, which includes the project area, has 2.00 acres of neighborhood and community park acreage per 1,000 people. While the Department of Recreation and Parks is implementing the 50 Parks Initiative, which would create small pocket parks typically less than half an acre with a service radius of ½ mile, none of these planned parks is within a ½ mile of the project site.

Based on the standard minimum parkland-to-population ratio provided in the City's General Plan Framework Element (i.e., two acres per 1,000 residents), the proposed project would generate a need for approximately 2.06 acres (approximately 89,908 sf) of public parkland (neighborhood and community parks). Based on the Los Angeles Department of Recreation and Parks (LADRP's), long-range minimum parkland-to-population ratio provided in the City's Public Recreation Plan (i.e., four acres per 1,000 residents), the proposed project would generate a need for approximately 4.13 acre (approximately 179,816 sf) of public parkland. Currently, a total of 240.5 acres of parks and recreational facilities are within the park service area of the project site.

Consistent with recommended LADRP strategy to help alleviate the burden upon existing recreational and park facilities, the proposed project would provide recreational amenities and open space for proposed project residents, including a lobby/lounge, fitness center, clubroom, courtyards, pool, spas, and private patios/balconies, totaling 38,947 square feet. These recreation amenities would help relieve stress on the City's existing park system.

The project will result in an increase in the use of parks; however, this impact would be reduced to a less than significant level by complying with existing regulations (payment of Dwelling Unit Construction Tax fees for construction of apartment complexes).

Cumulative Impacts

Less Than Significant Impact. Development of the proposed project, in conjunction with other development in the project site vicinity, would potentially result in an increase in permanent residents residing in the project site vicinity. In the absence of these other developments incorporating project specific mitigation, cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. However, the related projects may be required to pay Quimby and or other park (Finn) fees, as appropriate. Additionally, the proposed project includes recreational amenities that would be used by project residents, which would help reduce the demand of project residents on parks and recreational facilities in the community. Therefore, the proposed project would not significantly contribute to cumulative impacts on parks and recreational facilities.

e) Other public facilities?

Less Than Significant Impact. For the purpose of this Initial Study, 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 a project site. Based on the *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

- The net population increase resulting from a project;
- 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
- Whether a project includes features that would reduce the demand for library services (e.g., library facilities or direct financial support to the Los Angeles Public Library).

The project area is served by the Los Angeles Public Library's (LAPL) San Pedro Regional Library, located at 931 S. Gaffey Street, approximately 0.9 miles from the project site. This branch is within the City's standard two-mile radius of the project site. There are currently 11.5 full-time employees on staff at this facility and it had a service capacity of 81,495 persons in 2010 and does not expect any increase in service capacity in the future.[60]

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for New Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 populations and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. While the updated Branch Facilities Plan provides general guidance on library facility improvements, no new development or renovation of library facilities is currently planned.

On March 8, 2011, the voters of the City of Los Angeles approved ballot Measure L, which will amend the City Charter "… to incrementally increase the amount the City is required to dedicate annually from its General Fund to the Library Department to an amount equal to .0300% of the assessed value of all property in the City, and incrementally increase the Library Department's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs, in order to provide Los Angeles neighborhood public libraries with additional funding to help restore library service hours, purchase books

[60] *Email Correspondence with Tom Jung, Los Angeles Public Libraries, dated August 7, 2015.*

and support library programs, subject to audits, using existing funds with no new taxes." Under the terms of Measure L, libraries will be required to pay for their own direct and indirect costs by July 2014.[61]

The proposed project would potentially generate approximately 1,034 residents, which would represent 5.2 percent [(1,034/20,000) x 100] of the expected change in service capacity from 2000 to 2020 for the San Pedro Regional Library. The expected 5.2 percent increase in service population as a result of the proposed project is not considered a substantial increase in demand to a library that currently adequately serves the existing population. As such, it is reasonable to conclude that the proposed project would not result in the need for expanded or newly constructed library facilities. Further, library funding is now mandated under City Charter 531 to be funded from property taxes including those assessed against the proposed project, which would increase with the new development. Therefore, impacts to library facilities would be less than significant.

Cumulative Impacts

Less Than Significant Impact. With the passage of ballot Measure L on March 8, 2011 to assist funding library services through the property tax system, development projects in the City of Los Angeles would no longer be subject to individual review during the entitlement process but would rather support the City of Los Angeles Public Library system through the payment of property tax.

The related projects that have a residential component could generate additional residents who could increase the demand upon library services. The San Pedro Regional Library does not meet the proposed new branch building size criteria and no new improvements to add capacity are proposed; thus, any new individual development would impact demands for library services.[62] The cumulative demand of the proposed project and the related projects may therefore present a potentially significant impact. However, the proposed project would represent approximately 5.2 percent of the expected increase in service population for the San Pedro Regional Library. The incremental increase from the proposed project would not represent a substantial increase in patrons. Therefore, the proposed project's contribution to cumulative impacts on libraries would be less than significant.

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[61] *City of Los Angeles Voter Information Pamphlet on Charter Amendments G, H, I, J, L, N, P, and Q, and Propositions M and O, website: http://cityclerk.lacity.org/election/2011_Measure_information.pdf.*

[62] *Email Correspondence with Tom Jung, Los Angeles Public Libraries, dated August 7, 2015.*

15. RECREATION

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a 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 2006*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a project;
- 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 a project's proportional contribution to the demand; and
- Whether a 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).

Based on the standard minimum parkland-to-population ratio provided in the City's General Plan Framework Element (i.e., two acres per 1,000 residents), the proposed project would generate a need for approximately 2.06 acres (approximately 89,908 sf) of public parkland (neighborhood and community parks). Based on the Los Angeles Department of Recreation and Parks (LADRP's), long-range minimum parkland-to-population ratio provided in the City's Public Recreation Plan (i.e., four acres per 1,000 residents), the proposed project would generate a need for approximately 4.13 acre (approximately 179,816 sf) of public parkland. Currently, a total of 240.5 acres of parks and recreational facilities are within the park service area of the project site.

Consistent with recommended LADRP strategy to help alleviate the burden upon existing recreational and park facilities, the proposed project would provide recreational amenities and open space for proposed project residents, including a lobby/lounge, fitness center, clubroom, courtyards, pool, spas, and private patios/balconies, totaling 38,947 square feet. These recreation amenities would help relieve stress on the City's existing park system.

The project would result in an increase in the use of parks; however, this impact would be reduced to a less than significant level by complying with existing regulations (payment of Dwelling Unit Construction Tax fees for construction of apartment complexes).

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. For the purpose of this Initial Study, a significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factor:

- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The proposed project would provide recreational amenities and open space for proposed project residents, including a lobby/lounge, fitness center, clubroom, courtyards, pool, spas, and private patios/balconies, totaling 38,947 square feet. These recreation amenities would be internal to the project and would help relieve stress on the City's existing park system. Construction of public facilities that could have an adverse physical effect on the environment would be less than significant.

Cumulative Impacts

Development of the proposed project, in conjunction with other development in the project site vicinity, would potentially result in an increase in permanent residents residing in the project site vicinity. In the absence of these other developments incorporating project specific mitigation, cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. However the related projects may be required to pay Quimby and or other park (Finn) fees, as appropriate. Additionally, the proposed project includes recreational amenities that would be used by proposed project residents, which would help reduce the demand of proposed project residents on parks and recreational facilities in the community. Therefore, the proposed project would not significantly contribute to cumulative impacts on parks and recreational facilities.

16. TRANSPORTATION/TRAFFIC

The following section summarizes and incorporates by reference the information provided in the Traffic Impact Study for the 550 S. Palos Verdes Street Project prepared by KOA Corporation in May2015 (Traffic Report). The Traffic Report is provided as Appendix G to this Initial Study.

a) Would the project conflict with 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. A significant impact could occur if a project were to result in substantial increases in traffic volumes in the vicinity of a project site such that the existing street capacity experiences a decrease in the existing volume to capacity ratios, or experiences increased traffic congestion exceeding LADOT's recommended level of service.

The development of the proposed approximately 385,300 square foot six-story multi-family residential project with 404 apartment units will be constructed on a site currently in use as office, commercial, and associated surface parking. The proposed project was determined by the Department of Transportation to not result in any significant traffic impacts at the 16 intersections that were identified for detailed analysis. The project was reviewed by the Department of Transportation on February 12, 2016; the Traffic Assessment (DOT Case No. HRB15-102956) outlining the project requirements is located in Appendix G-2.

Construction Traffic Impacts

The proposed project would be constructed over approximately 19 months and would be completed in phases: demolition of the existing structures and parking lot, excavation for the subterranean parking garage, construction of the parking garage, framing of the mixed use building and finishing of the mixed use building. The number of construction workers and construction equipment would vary throughout the construction process in order to maintain a reasonable schedule of completion. Construction workers would be on-site before 7:00 a.m. and would typically leave the project site prior to 5:00 p.m. Therefore, construction worker traffic would occur before the morning and afternoon peak commute hours.

The project site is located within a Special BOE Grading Area and therefore required Haul Route approval by the Board of Building and Safety Commissioners prior to issuance of a building permit. The anticipated haul route would be along Harbor Boulevard and John S. Gibson Boulevard to access the I-110 Freeway. Harbor Boulevard is designated as a Heavy Container Corridor by the Port of Los Angeles[63] and as a Major Highway Class II in the San Pedro Community Plan.[64] Harbor Boulevard is also designated for Goods

[63] *Port of Los Angeles, Engineering Division – Right of Way and Leases Section. Port of Los Angeles Heavy Container Corridor map, July 12, 2012. http://www.portoflosangeles.org/pdf/heavy_container%20_corridor.pdf. Accessed May 18, 2015.*

64 Los Angeles Department of City Planning. San Pedro Community Plan, 1999.

Movement in the Draft San Pedro Community Plan (Figure 4-3, Priority Streets).[65] Additionally, Gaffey Street is designated as a Major Highway Class II and would be available for use as an additional haul route.

The amount of export material at the site for the construction of the proposed project is estimated at 100,000 cubic yards of dirt. The most intensive activity would occur during the excavation of the site to accommodate the subterranean parking garage, which would occur over a period of approximately 3.5 months (70 working days). The project proposes to use double bottom dump trucks (capacity of 14 cubic yards per truck), which would require hauling approximately 7,143 loads. Based on the export quantities and schedule the average haul traffic would be 102 truckloads per day or 204 truck trips per day. On an average hourly basis spread over a 10-hour day, these trips would equal to approximately 10 loads per hour or 20 truck trips per hour.

Assuming a passenger car equivalency factor of 3.0 (PCE), this level of truck traffic would be equivalent to 61 passenger car trips per hour, which would be less than the project's traffic generation when fully operational. This level of traffic from truck hauling is not expected to result in a significant traffic impact on the street system, given the available capacity of the roadway system as discussed in the operational traffic impact analysis below.

As part of project requirements outlined by LA DOT and included as Mitigation Measures XVI-1 and XVI-30, -40, -50, -60, and -80, the project applicant would be required to submit formal construction staging and traffic control plans for review and approval by the local agency prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. This plan would also incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. Construction equipment and worker cars would generally be contained on-site. At times when on-site staging and parking is not available, a secondary staging area would be required. The Work Area Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians. The mitigation measure includes access restrictions, covered sidewalks, and designating alternative pedestrian routes. Therefore, the traffic impacts associated with the construction activities would be less than significant. Nevertheless, it is necessary to develop and implement an approved Work Area Traffic Control plan including a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction.

[65] *Los Angeles Department of City Planning. Draft San Pedro Community Plan, August 2012.*

Operational Traffic Impacts

Level of Service is a term used to describe prevailing conditions and their effect on traffic. Broadly interpreted, the Level of Service concept denotes any one of a number of differing combinations of operating conditions which may take place as a roadway is accommodating various traffic volumes. Level of Service is a qualitative measure of the effect of such factors as travel speed, travel time, interruptions, freedom to maneuver, safety, driving comfort and convenience.

Six Levels of Service, A through F, have been defined in the 1965 *Highway Capacity Manual*. Level of Service A describes a condition of free flow, with low traffic volumes and relatively high speeds, while Level of Service F describes forced traffic flow at low speeds with jammed conditions and queues which cannot clear during the green phases.

Critical Movement Analysis (CMA) is a procedure which provides a capacity and level of service geometry and traffic signal operation and results in a level of service determination for the intersection as a whole operating unit.

The per lane volume for each movement in the intersection is determined and the per lane intersection capacity based on the Transportation Research Board (TRB) Report 212 (*Interim Materials on Highway Capacity*). The resulting CMA represents the ratio of the intersection's cumulative volume over its respective capacity (V/C ratio). Critical Movement Analysis takes into account lane widths, bus and truck operations, pedestrian activity and parking activity, as well as number of lanes and geometrics.

The Level of Service (abbreviated from the H*ighway Capacity Manual*) are shown in Table III-18 with their corresponding CMA and characteristics. Load Factor is that proportion of the signal cycles during the peak hour which are fully loaded; i.e. when all of the vehicles waiting at the beginning of green are not able to clear on that green phase.

Table III-18
Critical Movement Analysis Characteristics

CMA Value	LOS	Intersection Operation/Traffic Flow Characteristics
$\leq$ 0.600	A	No congestion; all vehicles clear in a single cycle.
> 0.61 $\leq$ 0.70	B	Minimal congestion; all vehicles still clear in a single cycle.
> 0.71 $\leq$ 0.80	C	No major congestion; most vehicles clear in a single cycle.
> 0.81 $\leq$ 0.90	D	Generally uncongested, but vehicles may wait through more than one cycle; short duration queues may form on critical approaches.

> 0.91 ≤ 1.000	E	Increased congestion on critical approaches; long duration queues form at higher end of range.
Not Applicable	F	Over capacity; forced flow with long periods of congestion; substantial queues form.

City of Los Angeles Impact Criteria and Thresholds

The relative impact of the added traffic volumes to be generated by the project during the AM and PM peak hours was evaluated based on analysis of future operating conditions at the study intersections, without and with the project. The previously discussed capacity analysis procedures were utilized to evaluate the future v/c relationships and service level characteristics at each study intersection.

The significance of the potential impacts of project generated traffic was identified using the traffic impact criteria set forth in LADOT's Traffic Study Policies and Procedures, August 2014. According to the City's published traffic study guidelines, the impact is considered significant if the project-related increase in the v/c ratio is equal to or exceeds the thresholds presented in Table III-19.

Table III-19
City of Los Angeles Intersection Impact Threshold Criteria

Final v/c	Level of Service	Project Related Increase in v/c
> 0.701 - 0.800	C	equal to or greater than 0.040
> 0.801 - 0.900	D	equal to or greater than 0.020
> 0.901	E or F	equal to or greater than 0.010

KOA conducted a traffic study to assess the potential impacts of the project on the surrounding roadway system. This study was prepared in accordance with the assumptions, methodology and procedures approved by the City of Los Angeles Department of Transportation (LADOT). Within the study, the existing (2015) and future (2017) peak-hour traffic conditions anticipated to be present with and without completion of the project were analyzed at the following 16 study intersections:

1. Gaffey Street and I-110 southbound off-ramp
2. Gaffey Street and 1st Street
3. Gaffey Street and 5th Street
4. Gaffey Street and 6th Street (unsignalized)
5. Gaffey Street and 7th Street
6. Pacific Avenue and 1st Street
7. Pacific Avenue and 5th Street
8. Pacific Avenue and 6th Street
9. Pacific Avenue and 7th Street

10. Harbor Boulevard and I-110 Northbound on-ramp (unsignalized)
11. Harbor Boulevard and State Route 47 on and off-ramps
12. Harbor Boulevard and O Farrell Street
13. Harbor Boulevard and 1st Street
14. Harbor Boulevard and 5th Street
15. Harbor Boulevard and 6th Street
16. Western Avenue and 1st Street

Existing (2015) Traffic Volumes

Fieldwork within the project study area was undertaken to identify the condition of key study area roadways, to identify traffic control and approach lane configuration at each study intersection, and to identify the locations of on-street parking and transit stops. Traffic counts (including bicycles, and pedestrians) were collected at the study intersections on a weekday during the timeframes of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m. on March 18, 2015. These counts were utilized to define existing volumes for the weekday a.m. and p.m. peak-hour level of service calculations.

Based on the existing traffic volumes and the intersection geometries, volume-to capacity ratios and corresponding levels of service (LOS) were determined for the study intersections during the weekday a.m. and p.m. peak hours.

Table III-20 summarizes the volume/capacity ratios and LOS values for this scenario. As indicated by the data within this table, 14 of the 16 study intersections are currently operating at good levels of service (LOS D or better) during the weekday a.m. and p.m. peak hours.

The two study intersections that are operating at LOS E or F during one or more study periods are as follows:

- Gaffey Street and 1st Street (LOS F during a.m. peak hour and LOS E during p.m. peak hour)
- Gaffey Street and 6th Street (LOS F during a.m. peak hour and LOS F during p.m. peak hour)

Table III-20
Summary of Volume to Capacity Ratios and LOS
Existing (2015) Conditions

Int. No.	Intersection	AM Peak		PM Peak	
		V/C or Delay	LOS	V/C or Delay	LOS
1	Gaffey Street & I-110 SB Off-Ramp	0.371	A	0.479	A
2	Gaffey Street & 1st Street	1.024	**F**	0.931	**E**
3	Gaffey Street & 5th Street	0.685	B	0.606	B
4	Gaffey Street & 6th Street*	>100	**F**	>100	**F**

Int. No.	Intersection	AM Peak		PM Peak	
		V/C or Delay	LOS	V/C or Delay	LOS
5	Gaffey Street & 7th Street	0.645	B	0.604	B
6	Pacific Avenue & 1st Street	0.445	A	0.383	A
7	Pacific Avenue & 5th Street	0.447	A	0.387	A
8	Pacific Avenue & 6th Street	0.367	A	0.365	A
9	Pacific Avenue & 7th Street	0.433	A	0.375	A
10	Harbor Boulevard & I-110 NB On-Ramp *	9.6	A	9.5	A
11	Harbor Boulevard & SR-47 On/Off-Ramps	0.599	A	0.565	A
12	Harbor Boulevard & O Farrell Street	0.421	A	0.398	A
13	Harbor Boulevard & 1st Street	0.416	A	0.462	A
14	Harbor Boulevard & 5th Street	0.342	A	0.416	A
15	Harbor Boulevard & 6th Street	0.283	A	0.254	A
16	Western Avenue & 1st Street	0.869	D	0.810	D

LOS = Level of Service; V/C = Volume-to-Capacity Ratio
** - Unsignalized*
Source: KOA Corporation, May 2015.

Trip Generation

Traffic-generating characteristics of many land uses, including the residential use proposed for the project, have been surveyed and documented in studies conducted under the auspices of the Institute of Transportation Engineers (ITE). The trip generation rates in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Los Angeles and the surrounding region. Accordingly, for this analysis, the ITE Trip Generation rates were used to determine the daily and AM and PM peak-hour trips generated by the proposed use. The following trip generation rates were used to forecast the traffic volumes expected to be generated by the project land use components:

- Apartment: ITE Land Use Code 220 (Apartment) trip generation average rates were used to forecast the traffic volumes expected to be generated by the apartment component of the project.
- Retail: The 5,200 square feet of ground floor commercial area would be occupied by retail uses. ITE Land Use Code 820 (Retail) trip generation average rates were used to forecast the traffic volumes expected to be generated by the commercial component of the project.
- Office: Trip generation was calculated for the existing office uses using ITE Land Use Code 710 (Office).

In addition to the trip generation forecasts for the project land use components (which are essentially an estimate of the number of vehicles that could be expected to enter and exit the site access points), an internal capture adjustment has been applied for the project to account for the synergistic effects of the planned land use mix. Internal capture trips are those trips made internal to the site between land uses in a mixed or multi-use development. When combined within a mixed or multi-use development, land uses tend to interact, and thus attract a portion of each other's trip generation.

An internal capture adjustment of 10 percent has been utilized to account for the interaction between the retail and apartment land uses. Lastly, a forecast was made of likely pass-by trips. Pass-by trips are made as intermediate stops on the way from an origin to a primary destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. Based on the *LADOT Policy on Pass-By Trips*, a 50 percent pass-by reduction adjustment was applied to the retail land use component of the project.

The results of the project trip generation calculations are summarized in Table III-21. As shown in this table, the proposed project is projected to generate approximately 2,738 net new weekday daily trips, including 188 net new trips during the a.m. peak hour and 237 net new trips during the p.m. peak hour.

Table III-21
Project Trip Generation

Size/Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Use							
403 Apartments*	2,680	41	165	206	163	87	250
Retail (5,200 SF)	222	3	2	5	9	10	19
Less Internal Capture (10%)	0	0	0	0	(1)	(1)	(2)
Less Pass-By Trips (50%)	0	0	0	0	(4)	(4)	(8)
Retail Subtotal	***162***	***2***	***2***	***4***	***3***	***3***	***6***
Net Trips (Proposed Project)	**2,902**	**44**	**167**	**211**	**167**	**92**	**259**
Existing Uses Removed							
Office	(164)	(20)	(3)	(23)	(4)	(18)	(22)
Total Net New Proposed Use Trips	***2,738***	***24***	***164***	***188***	***163***	***74***	***237***

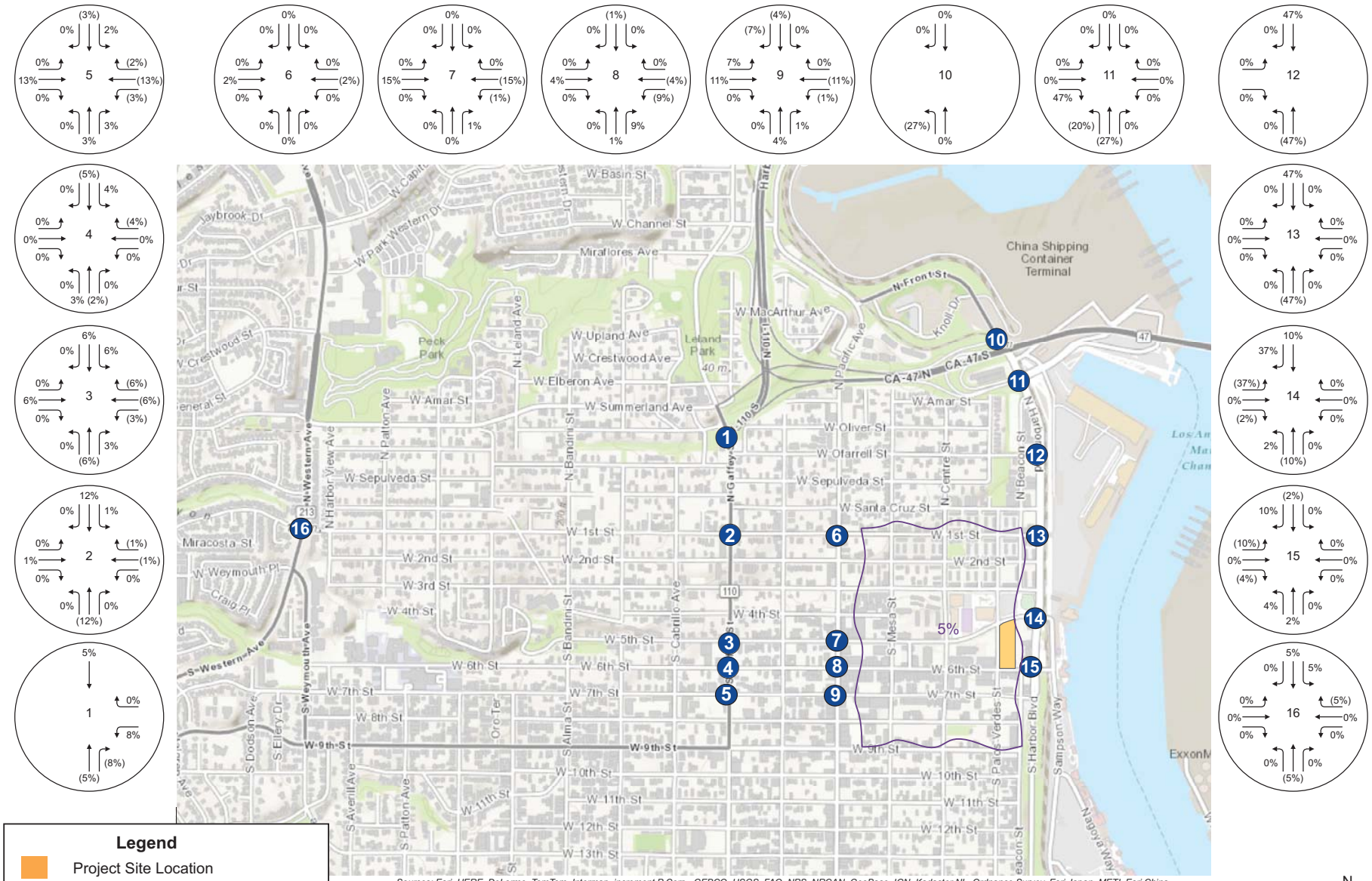
**The Traffic Report was originally prepared for a project with more units and slightly different square footage of retail uses. The City has confirmed that the project impacts are applicable and are in fact, conservative and slightly overstated.*
Source: KOA Corporation, May 2015.

Trip Distribution and Assignment

Trip distribution is the process of assigning the directions from which traffic will access a project site. Trip distribution is dependent upon the land use characteristics of the project, the local roadway network, and the general locations of other land uses to which project trips would originate or terminate.

Based on the trip generation and distribution assumptions described above, project traffic was assigned to the roadway system based on site driveway locations, the pick-up/drop-off location, and the roadways that would likely be used to access the regional highway system.

Figure III-2 intersection trip distribution percentages that were applied to the project trip generation. Figures III-3 and III-4 illustrate the assigned project trips for the weekday AM and PM peak hours, respectively.



Source: KOA Corporation, May 2015.

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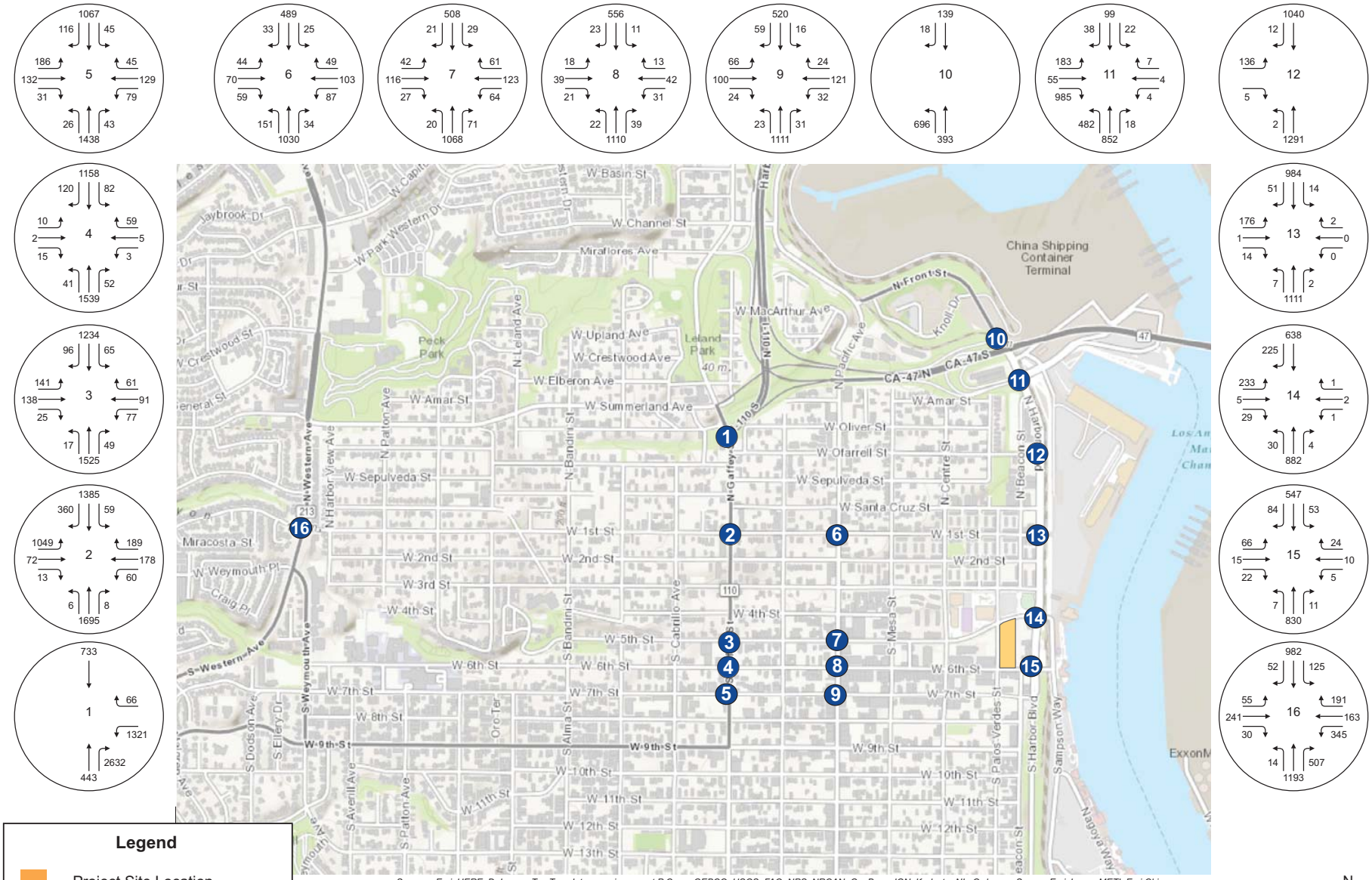
Figure III-2
Project Trip Distribution



Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Legend

- Project Site Location
- # Study Intersection and Reference Number
- xx Intersection Turn Volumes

N

Source: KOA Corporation, May 2015.

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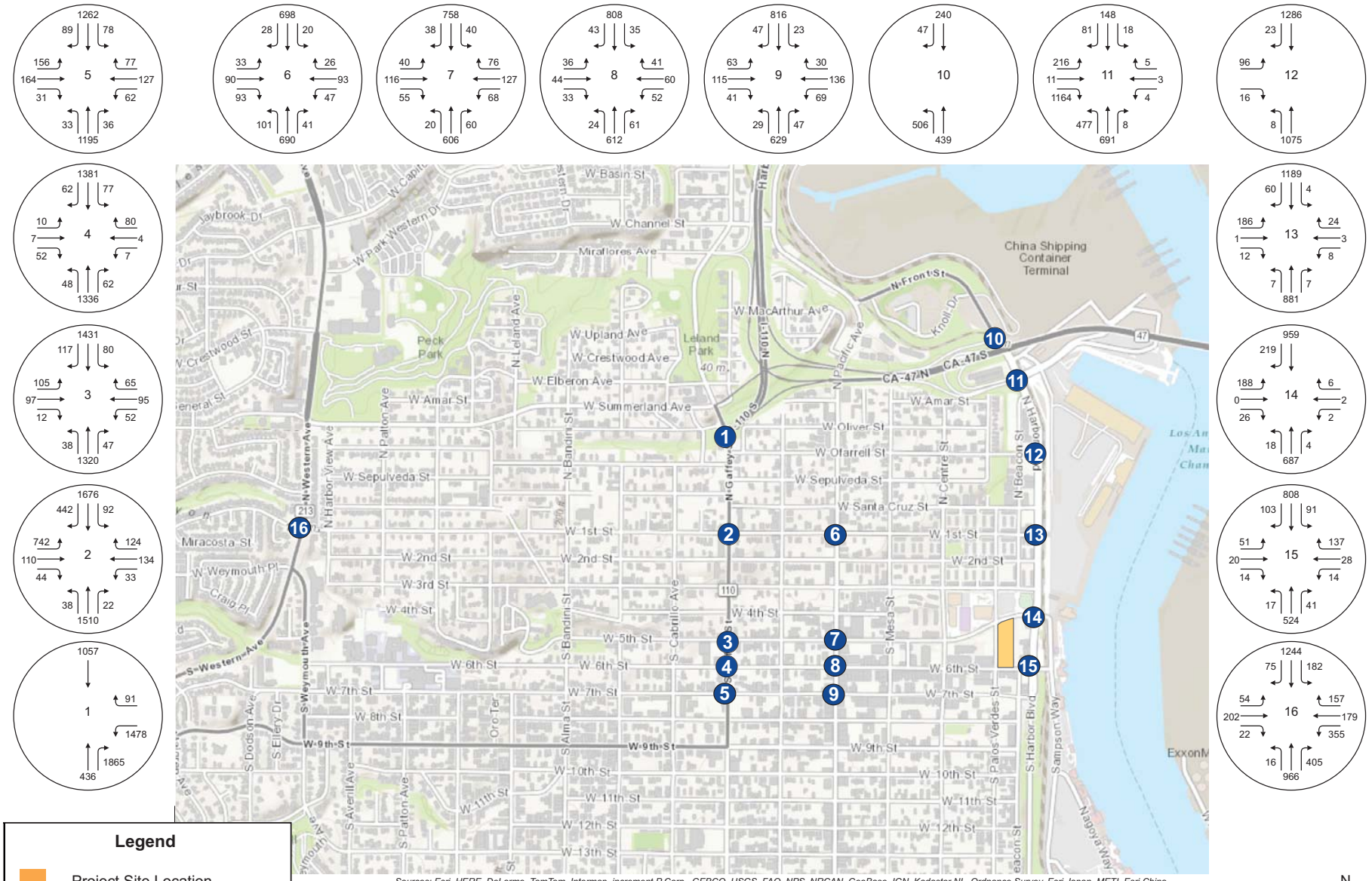
Figure III-3
Project Traffic Volumes Weekday AM Peak Hour



Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Legend

- Project Site Location
- # Study Intersection and Reference Number
- xx Intersection Turn Volumes

N

Source: KOA Corporation, May 2015.

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Figure III-4
Project Traffic Volumes Weekday PM Peak Hour

Significant Traffic Impact Criteria

As shown in Table III-18, LADOT defines a significant traffic impact attributable to a project based on a "stepped scale" with intersections experiencing high volume-to-capacity ratios being more sensitive to additional traffic than those operating with more available capacity. According to LADOT policy, a significant impact is identified as an increase in the CMA value due to project-related traffic of 0.010 or more when the final (with project) Level of Service is LOS E or F, a CMA increase of 0.020 or more when the final Level of Service is LOS D, or a CMA increase of 0.040 or more at LOS C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays.

Existing (2015) With Project Conditions – Project Traffic Impacts

Traffic volumes generated by the proposed project were added to the Existing (2015) volumes to form the "Existing With Project" intersection volumes. This scenario was analyzed in order to comply with rulings in the Sunnyvale and Expo Line CEQA court cases. Table III-21 presents the results of the CMA and LOS analysis of the Existing (2015) and Existing With Project conditions.

As shown in Table III-22, 14 of the 16 study intersections would continue to operate at good levels of service (LOS D or better) during the weekday AM and PM peak hours. The two study intersections that would continue to operate at LOS E or F during one or more study periods are as follows:

- Gaffey Street and 1st Street (LOS F during AM peak hour and LOS E during PM peak hour)
- Gaffey Street and 6th Street (LOS F during AM peak hour and LOS F during PM peak hour)

Table III-22
Assessment of Project Impacts Based on Existing Conditions

	Study Intersections		Existing (2015) Conditions		Existing (2015) + Project			
		Peak Hour	V/C or Delay (sec.)	LOS	V/C or Delay (sec.)	LOS	Change in V/C	Sig Impact?
1	Gaffey Street & I-110 SB Off-Ramp	AM	0.371	A	0.371	A	0.000	No
		PM	0.479	A	0.483	A	0.004	No
2	Gaffey Street & 1st Street	AM	1.024	**F**	1.031	**F**	0.007	No
		PM	0.931	**E**	0.939	**E**	0.008	No
3	Gaffey Street & 5th Street	AM	0.685	B	0.704	C	0.019	No
		PM	0.606	B	0.622	B	0.016	No
4	Gaffey Street & 6th Street *	AM	>100	**F**	>100	**F**	N/A	[a]
		PM	>100	**F**	>100	**F**	N/A	[a]
5	Gaffey Street & 7th Street	AM	0.645	B	0.664	B	0.019	No
		PM	0.604	B	0.613	B	0.009	No
		AM	0.445	A	0.445	A	0.000	No

Study Intersections		Peak Hour	Existing (2015) Conditions		Existing (2015) + Project		Change in V/C	Sig Impact?
			V/C or Delay (sec.)	LOS	V/C or Delay (sec.)	LOS		
6	Pacific Avenue & 1st Street	PM	0.383	A	0.385	A	0.002	No
7	Pacific Avenue & 5th Street	AM	0.447	A	0.463	A	0.016	No
		PM	0.387	A	0.394	A	0.007	No
8	Pacific Avenue & 6th Street	AM	0.367	A	0.378	A	0.011	No
		PM	0.365	A	0.373	A	0.008	No
9	Pacific Avenue & 7th Street	AM	0.433	A	0.447	A	0.014	No
		PM	0.375	A	0.391	A	0.016	No
10	Harbor Boulevard & I-110 NB On-Ramp*	AM	9.6	A	9.8	A	0.2	-
		PM	9.5	A	9.6	A	0.1	-
11	Harbor Boulevard & SR-47 On/Off-Ramps	AM	0.599	A	0.619	B	0.020	No
		PM	0.565	A	0.601	B	0.036	No
12	Harbor Boulevard & O Farrell Street	AM	0.421	A	0.449	A	0.028	No
		PM	0.398	A	0.424	A	0.026	No
13	Harbor Boulevard & 1st Street	AM	0.416	A	0.445	A	0.029	No
		PM	0.462	A	0.491	A	0.029	No
14	Harbor Boulevard & 5th Street	AM	0.342	A	0.390	A	0.048	No
		PM	0.416	A	0.464	A	0.048	No
15	Harbor Boulevard & 6th Street	AM	0.283	A	0.296	A	0.013	No
		PM	0.254	A	0.264	A	0.010	No
16	Western Avenue & 1st Street	AM	0.869	D	0.873	D	0.004	No
		PM	0.810	D	0.813	D	0.003	No

Planned Improvements

The City of Los Angeles, as part of the 2010 Bicycle Plan, is increasing the number of bicycle facilities in the City. Within the study area, the planned bicycle facilities are described below.

Bike lanes are proposed on Pacific Avenue from Front Street to 22nd Street. The number of through lanes on Pacific Avenue will be reduced from four lanes to two lanes to accommodate the bike lanes on both sides of the street.

As part of the 2010 Bicycle Plan, three new bikeway networks were introduced: Backbone Bikeway Network, Neighborhood Bikeway Network, and Green Bikeway Network. The existing and future bike lanes and routes in the study area were designated by the following categories per the 2010 Bicycle Plan:

Backbone Bikeway Network

- Pacific Avenue from Front Street to 22nd Street
- 9th Street from Miraleste Drive to Beacon Street

- Harbor Boulevard/Front Street from Pacific Avenue to 22nd Street

Neighborhood Bikeway Network

- Grand Avenue from 170 feet north of Oliver Street to 24th Street
- First Street from Harbor Boulevard to Western Avenue
- Cabrillo Avenue from Sepulveda Street to 26th Street

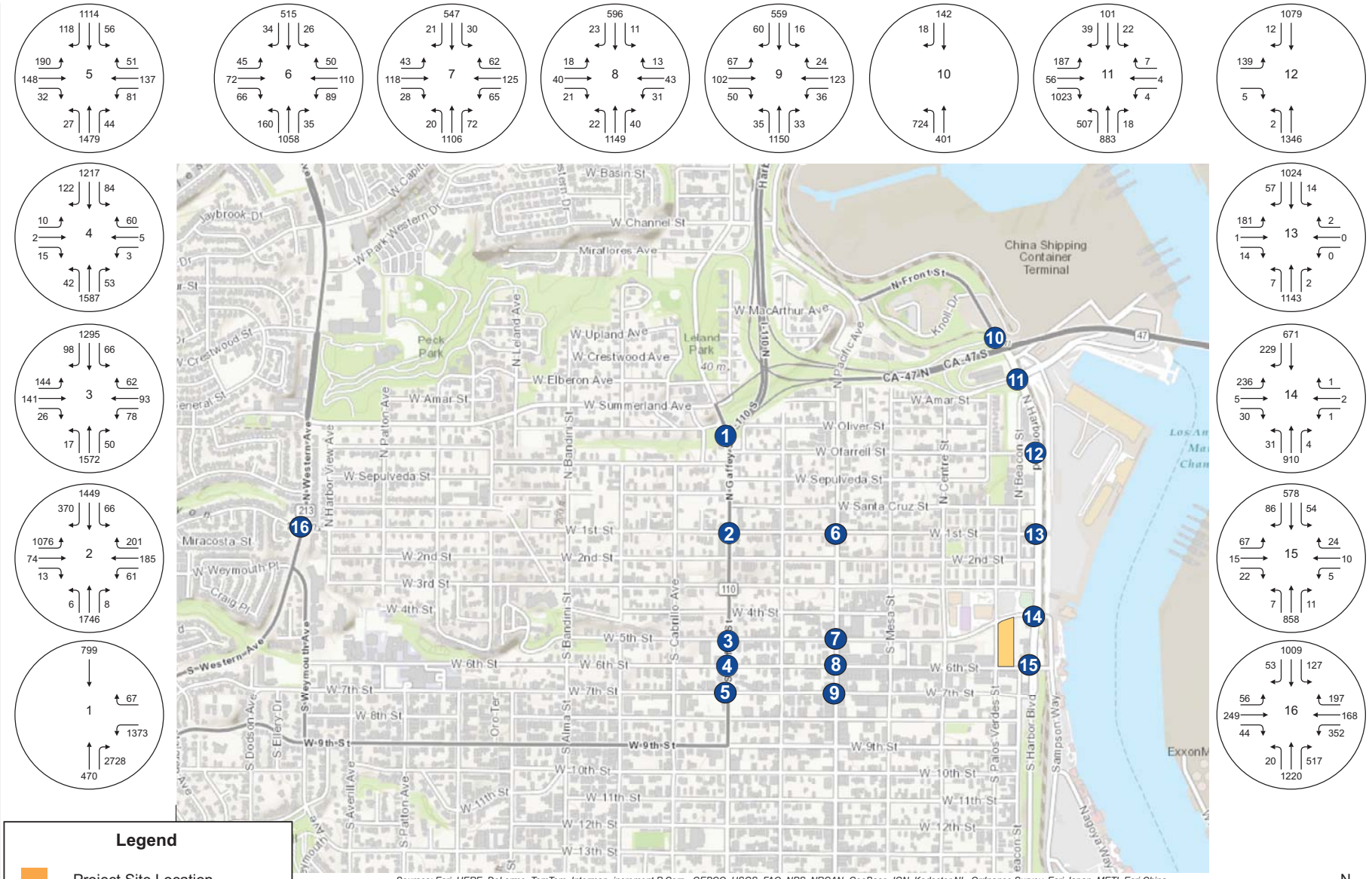
Traffic Signal Synchronization

The City of Los Angeles Automated Traffic Surveillance and Control (ATSAC) and Adaptive Traffic Control System (ATCS) provides computer control of traffic signals allowing automatic adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by accidents, the ability to centrally implement special purpose short term traffic timing changes in response to incidents, and the ability to quickly identify signal equipment malfunctions. ATCS provides real time control of traffic signals and includes additional loop detectors, closed-circuit television, an upgrade in the communications links and a new generation of traffic control software. LADOT estimates that the ATSAC system reduces the critical v/c ratios by seven percent (0.07). According to the City of Los Angeles, ATSAC/ATCS system upgrades for all 16 study intersections have been implemented.

Future (2017) Without and With Project Conditions – Cumulative Traffic Impacts

Based on an analysis of the trends in traffic growth in the San Pedro community over the last several years, an annual traffic growth factor of 1.0 percent for the area street system was applied, as approved by LADOT. This growth factor was assumed to account for increases in traffic due to potential projects not yet proposed or projects outside the study area. Compounded annually, the growth factor was applied to the existing traffic volumes to develop the estimated baseline volumes for the study year 2017.

In addition to the use of the ambient growth rate, listings of potential related projects in the study area that might be developed within the study time frame were obtained from LADOT, Los Angeles Unified School District (LAUSD) and recent studies of projects in the area. A review of this information indicated that a total of 5 related projects within an approximate 1-mile radius of the project site could add traffic to the study intersections. The related projects are identified in Section II.5, Project Description/Related Projects of this Initial Study and shown in Figure II-18 and III-2. The trip generation associated with these related projects is included in Appendix G to this Initial Study.



Source: KOA Corporation, May 2015.

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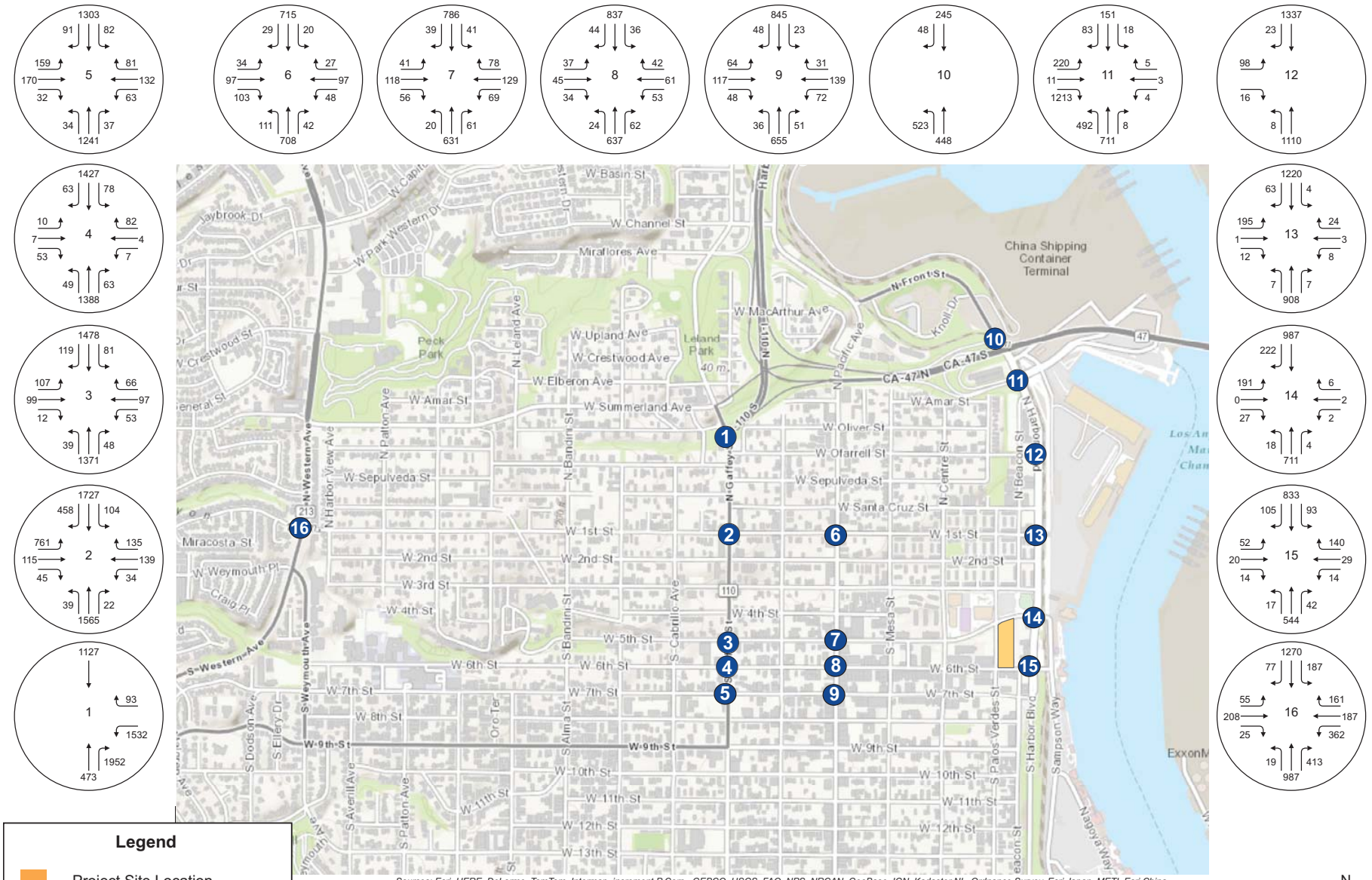
Figure III-5
Future 2017 With Project-Weekday AM Peak Hour Turn Volumes



Source: KOA Corporation, May 2015.

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Figure III-6
Future 2017 With Project-Weekday PM Peak Hour Turn Volumes

For the analysis of Future (2017) Without Project traffic conditions, the related projects trips were assigned to the study area street system using methodologies similar to those previously described for project trip assignment. These total future volumes provided the basis for the "Without Project" condition. Finally, project traffic was analyzed as an incremental addition to the Future (2017) "Without Project" condition to determine the Future (2017) "With Project" condition.

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described previously in this report. For the analysis of future project traffic impacts, the current roadway system's geometric and signal operation characteristics were assumed to prevail. The results of the analysis of future traffic conditions at the study intersections are summarized in Table III-22. As shown in Table III-23, 13 of the 16 study intersections would continue to operate at good levels of service (LOS D or better) during the weekday AM and PM peak hours. The three study intersections that would operate at LOS E or F during one or more study periods are as follows:

- Gaffey Street and 1st Street (LOS F during AM peak hour and LOS E during PM peak hour)
- Gaffey Street and 6th Street (LOS F during AM peak hour and LOS F during PM peak hour)
- Western Avenue and 1st Street (LOS E during AM peak hour)

In summary, the development of the proposed project would not result in significant project-related or cumulative traffic impacts at any of the 16 study intersections. No intersection mitigation measures are required.

Table III-23
Assessment of Project Impacts Based on Future Conditions (Year 2017)

	Study Intersections		Future (2017) No Project		Future (2017) With Project		Change in V/C	Sig Impact?
		Peak Hour	V/C or Delay (sec.)	LOS	V/C or Delay (sec.)	LOS		
1	Gaffey Street & I-110 SB Off-Ramp	AM	0.397	A	0.397	A	0.000	No
		PM	0.507	A	0.512	A	0.005	No
2	Gaffey Street & 1st Street	AM	1.065	**F**	1.072	**F**	0.007	No
		PM	0.969	**E**	0.976	**E**	0.007	No
3	Gaffey Street & 5th Street	AM	0.706	C	0.725	C	0.019	No
		PM	0.628	B	0.645	B	0.017	No
4	Gaffey Street & 6th Street *	AM	>100	**F**	>100	**F**	N/A	[a]
		PM	>100	**F**	>100	**F**	N/A	[a]
5	Gaffey Street & 7th Street	AM	0.679	B	0.697	B	0.018	No
		PM	0.627	B	0.635	B	0.008	No
6	Pacific Avenue & 1st Street	AM	0.827	D	0.827	D	0.000	No
		PM	0.656	B	0.658	B	0.002	No
7	Pacific Avenue & 5th Street	AM	0.843	D	0.859	D	0.016	No
		PM	0.621	B	0.629	B	0.008	No

Study Intersections		Peak Hour	Future (2017) No Project		Future (2017) With Project		Change in V/C	Sig Impact?
			V/C or Delay (sec.)	LOS	V/C or Delay (sec.)	LOS		
8	Pacific Avenue & 6th Street	AM	0.761	C	0.773	C	0.012	No
		PM	0.625	B	0.632	B	0.007	No
9	Pacific Avenue & 7th Street	AM	0.827	D	0.842	D	0.015	No
		PM	0.659	B	0.677	B	0.018	No
10	Harbor Boulevard & I-110 NB On-Ramp*	AM	9.8	A	10.1	B	0.3	-
		PM	9.6	A	9.7	A	0.1	-
11	Harbor Boulevard & SR-47 On/Off-Ramps	AM	0.624	B	0.645	B	0.021	No
		PM	0.591	A	0.626	B	0.035	No
12	Harbor Boulevard & O Farrell Street	AM	0.442	A	0.470	A	0.028	No
		PM	0.416	A	0.444	A	0.028	No
13	Harbor Boulevard & 1st Street	AM	0.432	A	0.460	A	0.028	No
		PM	0.480	A	0.508	A	0.028	No
14	Harbor Boulevard & 5th Street	AM	0.358	A	0.405	A	0.047	No
		PM	0.429	A	0.477	A	0.048	No
15	Harbor Boulevard & 6th Street	AM	0.295	A	0.307	A	0.012	No
		PM	0.264	A	0.275	A	0.011	No
16	Western Avenue & 1st Street	AM	0.901	**E**	0.905	**E**	0.004	No
		PM	0.834	D	0.837	D	0.003	No

Although project impacts would be less than significant, the following mitigation measures shall be included as Conditions of Approval for the project, as required by LADOT.

Mitigation Measure

XVI-1 A. Highway Dedication and Physical Street Improvements.

1. Traffic Signalization at 6th and Gaffey Streets. Although the traffic study report has not assigned a specific measure of significance to the project effect at this intersection, in order to insure the opportunity to provide a full accounting of any potential safety issues that may need to be addressed, DOT is recommending that the project provide the City with a Guarantee Agreement that will allow for additional analysis to be conducted at this location for a term of five (5) years, beginning with the issuance of the project certificate of occupancy by the Department of Building and Safety. The initial funding amount to be guaranteed through this agreement shall be $50,000 and shall be immediately transferred to DOT upon written notice that the City has made a determination to move forward with the improvement. Should other funding sources become available, the final funding amount could be reduced. If at the end of the five (5) year term, DOT has determined that a traffic signal is not warranted, the agreement shall be terminated.

2. Highway Dedication. The applicant shall further consult the Bureau of Engineering (BOE) for any additional highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE.

B. Construction Impacts: A construction work site traffic control plan shall be submitted to DOT's Southern District Office for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to all abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

C. Site Access and Internal Circulation: This determination does not include approval of the proposed project's driveways, internal circulation, and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant shall consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

D. Development Review Fees: An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to the Department of Transportation for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

XVI-30 Transportation

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The applicant shall be limited to no more than two trucks at any given time within the site's staging area.
- There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
- No hauling shall be done before 9 a.m. or after 3 p.m.
- Trucks shall be spaced so as to discourage a convoy effect.

- On substandard hillside streets, only one hauling truck shall be allowed on the street at any time.
- A minimum of two flag persons are required. One flag person is required at the entrance to the project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the project site in each direction.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind.
- Loads shall be secured by trimming and watering or may be covered to prevent the spilling or blowing of the earth material.
- Trucks and loads are to be cleaned at the export site to prevent blowing dirt and spilling of loose earth.
- No person shall perform grading within areas designated "hillside" unless a copy of the permit is in the possession of a responsible person and available at the site for display upon request.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

XVI-40 Safety Hazards

Environmental impacts may result from project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. However, the potential impacts can be mitigated to a less than significant level by the following measure:

- The developer shall install appropriate traffic signs around the site to ensure pedestrian, bicycles, and vehicle safety.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

XVI-50 Inadequate Emergency Access

Environmental impacts may result from project implementation due to inadequate emergency access. However, these impacts can be mitigated to a less than significant level by the following measure:

- The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.

XVI-60 Inadequate Emergency Access (Hillside Streets – Construction Activities)

- No parking shall be permitted on the street during Red Flag Days in compliance with the "Los Angeles Fire Department Red Flag No Parking" program.
- All demolition and construction materials shall be stored on-site and not within the public right-of-way during demolition, hauling, and construction operations.

XVI-80 Pedestrian Safety

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

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. The Congestion Management Program (CMP) was enacted by Proposition 111 in 1990 with the intent of providing the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority (MTA), the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's LOS to implement the statutory requirements of the CMP. This monitoring of the CMP network is one of the responsibilities of local jurisdictions. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the proposed project will add 50 or more vehicle trips during either a.m. or p.m. weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours.

The nearest CMP arterial monitoring intersection is one of the study intersections at Gaffey Street and 9th Street. Based on the project trip generation and the distance of this location from the project site, it is estimated that 10 new trips during the AM. Peak hour and 12 new trips during the PM peak hour would be added at the CMP intersection. Therefore, no further analysis of potential CMP impacts is required.

The nearest freeway monitoring station is located on Interstate 110 south of "C" Street, which is more than two miles from the project site. The project is not expected to add more than 150 trips in either direction at this location during the either the AM or PM weekday peak hours. Based on the project trip generation and the distance of this location from the project site, it is estimated that eight new southbound trips and 58 new northbound trips during the AM peak hour, and 58 new southbound trips and 26 new northbound trips during the PM peak hour would be added at the CMP freeway monitoring station. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is warranted or required.

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 a project only if it involved an aviation-related use or would influence changes to existing flight paths.

The 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 Basin. 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. For the purpose of this Initial Study, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

The subterranean parking facility will have access from a proposed alley located on the eastern boundary of the project site. The subterranean parking facility will have two entry/exit ramps to the alley. Full access to the alley will be provided from 5th Street and 6th Street. Neither 5th Street and 6th Street carry enough traffic to require any turn restrictions.

Pedestrian access is provided from both 5th Street and 6th Street to the B1 level of the parking garage. For safety, the pedestrian walkway would be paved with colored concrete at the garage entries. Driveway location and design will be subject to LADOT approval at the time of building permit issuance, which will ensure that City standards regarding sight lines and turning movements that provide for safe access for

the project and surrounding uses are implemented. Therefore, project driveways would not substantially increase hazards due to a design feature and impacts would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve a project site or adjacent uses.

As previously discussed in Section 8 (h), the proposed project is not located on or near an adopted emergency response or evacuation plan route. Emergency access to the project site would be provided by the existing and proposed street system. The proposed project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access.

As shown in Section 16 (a) while the proposed project is anticipated to affect vehicle/capacity ratios it does not affect the level of service of roadways in the project vicinity, traffic impacts would be less than significant. Increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the project's proposed circulation plan and the above considerations, it is anticipated that the LAFD and LAPD would be able to respond to on-site areas within the established response time. Furthermore, as described in Section 14 (a), the proposed project would satisfy the emergency response requirements of the LAFD, and as discussed in Section 16 (d), there are no hazardous design features included in the access design or site plan for the proposed project that could impede emergency access. The proposed project would be subject to the site plan review requirements of the LAFD, the LAPD and LADOT to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the proposed project would not be expected to result in inadequate emergency access, and the proposed project would have a less than significant impact on emergency access.

f) Would the project conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

The San Pedro community is served by public transit services provided by the Los Angeles County Metropolitan Transportation Authority (MTA), City of Los Angeles Department of Transportation (LADOT), and the Palos Verdes Peninsula Transit Authority. Several MTA and LADOT bus routes have stops within

reasonable walking distance (one-quarter of a mile) of the project site. Existing transit lines serving the project site is shown in Table III-24.

Table III-24
Transit Service Summary

Line	From	To	Via	Peak Frequency
Metro				
205	San Pedro	Willowbrook	Western Avenue/1st Street/Harbor Boulevard/7th Street/Pacific Avenue	20-40 Minutes
246	San Pedro	Los Angeles	Pacific Avenue	30 Minutes
450	San Pedro	Downtown Los Angeles	Pacific Avenue/1st Street Harbor Boulevard/O Farrell Street	10-30 Minutes
550	San Pedro	Exposition Park	7th Street/Gaffey Street	30-40 Minutes
LADOT DASH				
San Pedro	San Pedro	San Pedro	Gaffey Street/1st Street/7th Street	20 Minutes
142	San Pedro	Long Beach	Harbor Boulevard/7th Street/Gaffey Street	30 Minutes
Palos Verdes Peninsula Transit Authority				
GRE	Palos Verdes	San Pedro	Western Avenue	60 Minutes
GR	Palos Verdes	San Pedro	Western Avenue/1st Street	10-30 Minutes
O	Palos Verdes	San Pedro	Western Avenue/1st Street	80 Minutes
226	Palos Verdes	San Pedro	Western Avenue/1st Street	40-60 Minutes

The project would add up to approximately 1,034 people into the area that would potentially use the existing transit system. However, the project area is served by a variety of transit and this nominal level of new rider demand would not result in any significant transit-related impacts to the existing level of bus service in the area. Furthermore, the proposed project would not interfere with any Class I or Class II bikeway systems, as the project would not change in roadways or designated bikeway systems within the project vicinity. Since the proposed project would not modify or conflict with any alternative transportation policies, plans or programs, impacts would be less than significant.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. 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 a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the project area. The proposed project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Terminal Island Water Reclamation Plant (TIWRP). The capacity of the TIWRP is discussed in response to 17(b) below. The TIWRP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the proposed project at the project site would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB, and this impact 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. For the purpose of this Initial Study, 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 a project site would be exceeded. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for a project;
- Whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project buildout;

- The amount by which a 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

- 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 City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the project site. The LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved.

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of its 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). The average plant flow is approximately 324 mgd (averaged over Calendar Year 2014), and operates at between 50 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of approximately 175 mgd, depending on the season.

In addition to supplying water for domestic uses, the LADWP also supplies water for fire protection services, in accordance with Fire Code. The LAFD requires a water flow of 6,000 gpm flowing from four fire hydrants simultaneously for medium density residential development. There are no existing waterlines along 6th Street. The project site is currently served by existing water lines maintained by LADWP on other streets. There are currently no water service problems or deficiencies in the project area. However, if water main or infrastructure upgrades are required, including the installation of waterlines on 6th Street, the Applicant would pay for such upgrades and which would be constructed by either the applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant.

As shown on Table III-25 (Estimated Average Daily Water Demand for the Proposed Project), the average daily water demand for the proposed project is estimated to be approximately 84,469 gpd. The proposed

project would be within the growth projections of the LADWP and it is, therefore, anticipated that the LADWP would be able to meet the proposed project's water demand.

Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant.

Table III-25
Estimated Average Daily Water Demand for the Proposed Project

Land Use	Size	Consumption Rate [a]	Total Consumption (gpd)
Multi-Family – Studio	83	75 gpd / unit	6,225
Multi-Family – 1 bedroom	213	110 gpd / unit	23,430
Multi-Family – 2 bedroom	106	150 gpd / unit	15,900
Multi-Family –3bedroom	2	190 gpd / unit	380
Retail	5,200	300 gpd/1,000 sf	1,560
Gym	600	200 gpd/1,000 sf	120
Pool	32,254 cf	32,254 gpd	32,254
Spa	600 cf	7.48 gpd/cf	4,488
Total Water Consumption			**84,469**

Notes: gpd = gallons per day sf = square feet
[a] L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12.

Furthermore, the proposed project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. The LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat the LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Chapter XII of the LAMC comprises the City of Los Angeles Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the state level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. All in all, the proposed project's water demand is expected to comprise a small percentage of LADWP's existing water supplies.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant wastewater impact if:

A 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

- A 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 project area. The existing residential uses have sewer connections to the City's sewer system. Sewage from the project site is conveyed via sewer infrastructure to the TIWRP. The TIWRP treats wastewater in the Harbor area communities, including San Pedro. The plant treats an average of 16.5 million gallons of sewage and produces up to 4.5 million gallons of reclaimed water per day, which is distributed for reuse in the Harbor area. The Harbor Area is projected to generate 20 mgd of wastewater by 2020. The TIWRP has the capacity for 30 mgd and is currently operating below its capacity.[66]

As shown in Table III-26 (Estimated Average Daily Wastewater Generation for the Proposed Project) below, the proposed project would generate 84,469 gpd of wastewater. The addition of only 84,469 gpd of wastewater to the TIWRP is less than 0.4 percent of the remaining TIWRP capacity. Therefore, the TIWRP would have adequate capacity to serve the proposed project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant.

Table III-26
Estimated Average Daily Wastewater Generation for the Proposed Project

Land Use	Size	Generation Rate [a]	Total Generation (gpd)
Multi-Family – Studio	83	75 gpd / unit	6,225
Multi-Family – 1 bedroom	213	110 gpd / unit	23,430
Multi-Family – 2 bedroom	106	150 gpd / unit	15,900
Multi-Family –3bedroom	2	190 gpd / unit	380
Retail	5,200	300 gpd/1,000 sf	1,560
Gym	600	200 gpd/1,000 sf	120
Pool	32,254 cf	32,254 gpd	32,254
Spa	600 cf	7.48 gpd/cf	4,488
Total Wastewater Generation			**84, 469**

Notes: gpd = gallons per day sf = square feet
[a] L.A. Draft CEQA Thresholds Guide 2006, Exhibit M.2-12.

With respect to wastewater infrastructure, wastewater service is provided to the project site by existing sewer lines maintained by the Bureau of Sanitation. Sewer infrastructure in the vicinity of the project site

[66] *City of Los Angeles Department of Planning. Draft San Pedro Community Plan, August 2012. Website: http://cityplanning.lacity.org/cpu/SanPedro/Environmental_txt/SanPedroDraftCommunityPlan.pdf. Accessed March 18, 2016.*

includes an existing 8-inch line on Palos Verdes Street and 5th Street. These lines feed into a 21-inch line on Harbor Boulevard before discharging into a 33-inch sewer line on Harbor Boulevard. The current flow in some of these lines cannot be determined without additional gauging.[67] Based on the estimated wastewater generation of 84,469 gpd for the proposed project, existing sewer lines may have excess capacity. However, further detailed gauging and evaluation is needed to determine if the lines would be able to accommodate the additional flow.

Therefore, the City would require detailed gauging and evaluation of the proposed project's wastewater connection point at the time of connection to the system. Prior to any construction activities, the project Applicant would be required to coordinate with the City of LA Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately service the proposed project would be undertaken as part of the project. If deficiencies are identified at that time, the Applicant would be required, at its own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action and would not result in any adverse environmental impacts. Impacts to wastewater services would be less than significant.

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. For the purpose of this Initial Study, a significant impact may occur if the volume of storm water runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new storm water drainage facilities.

As described in Section 8(c), the proposed project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the project site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and no impact would occur.

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?

Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption to such a degree that new water sources

[67] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, May 28, 2015.*

would need to be identified. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for a project;
- Whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project buildout;
- The amount by which a 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
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

As stated Section 17(b), water demand for the project would be approximately 84,469 gallons per day. The proposed project would be within the growth projections of the LADWP and it is, therefore, anticipated that the LADWP would be able to meet the proposed project's water demand. Therefore, sufficient water supplies would be available to serve the proposed project from existing entitlements and resources, therefore, new or expanded entitlements will not be necessary. The project would be required to incorporate the Department of Water and Power's water-saving mitigation measures to ensure that the project would have a less than significant impact on the City's water supply.

Mitigation Measures

XVII-1 In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- o Weather-based irrigation controller with rain shutoff
- o Matched precipitation (flow) rates for sprinkler heads
- o Drip/microspray/subsurface irrigation where appropriate
- o Minimum irrigation system distribution uniformity of 75 percent
- o Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- o Use of landscape contouring to minimize precipitation runoff

XVII-2 Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

XVII-3 Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

XVII-4 A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.

XVII-5 Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-6 Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.

XVII-7 Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

XVII-8 Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, a project would normally have a significant wastewater impact if:

A 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

- A 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 Section 17 (b), the sewage flow from operation of the proposed project would ultimately be conveyed to the TIRWP, which has sufficient capacity for the proposed project.[68] Therefore, impacts would be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. For the purpose of this Initial Study, 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 City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of a project, considering proposed design and operational features that could reduce typical waste generation rates;

- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and

- Whether a 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 (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

It is assumed that the Applicant would contract with a local commercial solid waste hauler following completion of the proposed project. As is typical for most solid waste haulers in the greater Los Angeles Area, the hauler would most likely separate and recycle all reusable material collected from the project site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. However, over 90 percent of the construction and residential solid waste generated in the City of Los Angeles is disposed of at the Sunshine Canyon Landfill. The capacity and estimated closure date for the landfill is included in Table III-27 (Landfill Capacity and Intake).

[68] *City of Los Angeles Department of Planning. Draft San Pedro Community Plan, August 2012. Website: http://cityplanning.lacity.org/cpu/SanPedro/Environmental_txt/SanPedroDraftCommunityPlan.pdf. Accessed March 18, 2016.*

Table III-27
Landfill Capacity and Intake

Landfill Facility	Estimated Closure Date	Permitted Daily Intake (tons/day)	Average Daily Intake (tons/day)	Remaining Permitted Daily Intake (tons/day)
Sunshine Canyon [a]	2037	12,100	9,200	2,900
Chiquita Canyon [b]	2019	6,000	4,995	1,005
			Total Remaining Intake	***3,905***

Notes:
[a] Sunshine Canyon Landfill website, http://www.sunshinecanyonlandfill.com/home/Future.html.
[b] California Department of Resources Recycling and Recovery website, www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0052.

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the proposed project is estimated to generate a total of approximately 9,279 tons of solid waste over the approximately 19-month construction period[69]; approximately 383 tons of demolition debris per day over the approximately one-month demolition period (22 working days) and approximately 2.34 tons of construction waste per day over the 19-month construction period. The remaining combined daily intake of the Sunshine Canyon Landfill and Chiquita Canyon Landfill is 3,905 tons per day. As such, they would have adequate capacity to accommodate the construction waste generated by the proposed project over its entire construction period. Therefore, a less than significant impact associated with construction waste would occur.

As shown in Table III-28 (Estimated Average Daily Solid Waste Generation for the Proposed Project), the operation of the proposed project would generate 1,638 pounds per day.

This increase in solid waste per day is modest and would be handled by a local existing waste collection service. Additionally, the amount is minimal compared to daily capacities of nearby recycling or disposal facilities and transfer stations and these modest amounts would be further reduced through source reduction and recycling programs (as required by AB 939). Furthermore, the proposed project would not conflict with solid waste policies or objectives that are required by law, statute, or regulation. Therefore, the proposed project would result in a less than significant impact with respect to operational waste.

[69] *Approximately 70,657 cubic feet of asphalt, (one foot layer of asphalt over the project site) x 150 lbs/cu.ft = 5,299 tons of existing surface parking lot to be removed, plus 36,248 sf of commercial uses (173/sq.ft commercial construction) = 3,135 tons of existing building to be removed. Construction waste (4.38 lb./sq.ft. of residential construction) x 385,300 sq.ft. new building = 843.81 tons. (USEPA Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-1, A-2, and A-7)*

Table III-28
Estimated Average Daily Solid Waste Generation for the Proposed Project

Land Use	Size	Generation Rate [a]	Total Generation (lbs/day)
Multi-Family – Studio	83	4 lbs / unit	332
Multi-Family – 1 bedroom	213	4 lbs / unit	852
Multi-Family – 2 bedroom	106	4 lbs / unit	424
Multi-Family – 3 bedroom	2	4 lbs / unit	8
Retail	5,200 sf	.005 lbs/sf	26
Total Solid Waste Generation			**1,642**

Notes: lbs = pounds sf = square feet
[a] *Cal Recycle, website: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm .*

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 residential use and be consistent with all federal, state, and local statutes and regulations regarding proper disposal. The project will be required to provide on-site recycling to reduce the amount of trash going to landfills and this impact would be less than significant.

Cumulative Impacts

Water

Implementation of the proposed project in combination with the 5 related projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demands for any project that is consistent with the City's General Plan has been taken into account in the adopted Urban Water Management Plan. In conjunction with The City of Los Angeles Water Supply Action Plan[70], the UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2030 under wet and dry year scenarios. Therefore, cumulative impacts to water supply would be less than significant.

The remaining daily capacity of the LAAFP is 175 mgd of water. Therefore, the LAAFP would have adequate capacity to the additional water demanded by the proposed project and other growth within the LADWP

[70] *Los Angeles Department of Water and Power, 'Securing L.A.'s Water Supply' May 2008 website: http://www.ladwp.com/ladwp/cms/ladwp010587.pdf.*

service area, and a less-than-significant cumulative impact would occur. In addition, the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between the development of the proposed project and the related projects. Therefore, no cumulative water infrastructure impacts are anticipated from the development of the proposed project and the related projects.

Wastewater

Implementation of the proposed project in combination with the 5 related projects and other projects within the service area of the TIRWP would generate additional wastewater that would be treated at TIRWP. The Harbor Area is projected to generate 20 mgd of wastewater by 2020. The TIWRP has the capacity for 30 mgd and is currently operating below its capacity. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is little, if any, cumulative relationship between the development of the proposed project and the related projects. Therefore, no cumulative sewer infrastructure impacts are anticipated from the development of the proposed project and the related projects. Therefore, cumulative impacts on sewer service would be less than significant.

Solid Waste

Implementation of the proposed project in combination with the 5 related projects and other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. The construction timing of the proposed project and the related projects cannot be anticipated. It is reasonable to assume that few of the related projects would be constructed during the same time period as the proposed project. Therefore, it is unlikely that the construction of the proposed project, simultaneously with some of the related projects, would result in significant increase in the volume of construction-related solid waste. Regional solid waste management plans have identified sufficient landfill capacity to service the regional demand through the year 2050 with the addition of extra-regional facilities. Therefore, cumulative impacts on solid waste would be less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. For the purpose of this Initial Study, a significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections.

The proposed project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or cultural resources. 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. As such, the proposed project's contribution to cumulative impacts would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of 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)?

Less than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that 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/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the proposed project's contribution to cumulative impacts would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Unless Mitigation Incorporated. For the purpose of this Initial Study, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Mitigation measures are required for this project. The analysis contained in this Initial Study concludes that the proposed project would not result in significant adverse effects after implementation of mitigation measures.

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V. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
ARB	California Air Resources Board
ASTM	American Society for Testing Materials
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
bgs	Below ground surface
BID	Business Improvement District
BMPs	Best Management Practices
CAPCOA	California Air Pollution Control Officer's Association
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAT	Climate Action Team
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CH_4	Methane
CMP	Congestion Management Program
CO_2	Carbon Dioxide
CORTESE	California Hazardous Waste and Substances
cy	Cubic yards
dBA	A-weighted decibel
du	Dwelling unit
EPA	Environmental Protection Agency (see also USEPA)
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
gpd	Gallons per day

GFA	Gross floor area
GHG	Greenhouse gas
gpm	Gallons per minute
HFC	Hydrofluorocarbons
H_2O	Water Vapor
HTP	Hyperion Treatment Plant
IS	Initial Study
LACRA	City of Los Angeles Redevelopment Agency
LADRP	City of Los Angeles Department of Recreation and Parks
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lbs	Pounds
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
mgd	Million gallons per day
MRZ-2	Mineral Resource Zone 2
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
N_2O	Nitrous Oxide
NPDES	National Pollution Discharge Elimination System
PFC	Perfluorocarbon
PSI	Pounds per square inch
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Compensation and Recovery Act

RD	Reporting District
ROWD	Report of Waste Discharge
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
sf	Square foot
SF_6	Sulfur Hexafluoride
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
T-FAR	Transfer of Floor Area
TIWRP	Terminal Island Water Reclamation Plant
TPA1	Transit Priority Area
USEPA	United States Environmental Protection Agency (see also EPA)
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/capacity
VOC	Volatile Organic Compound