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CITY OF LOS ANGELES
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LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	CD 10 - HERB J. WESSON, JR.
PROJECT TITLE	**CASE NO.**
ENV-2018-3451-MND	CPC-2018-3450-ZC-HD-SPR-WDI

PROJECT LOCATION
6034 W JEFFERSON BLVD

PROJECT DESCRIPTION
The proposed Coffee Bean and Tea Leaf Project (proposed project) is intended to provide corporate headquarters office, manufacturing, and warehouse facilities for "The Coffee Bean & Tea Leaf" inclusive of a coffee bean roasting space and viewing area, and a drive-thru retail component. The development consists of two buildings totaling 218,778 square feet of floor area in two buildings, a 3-story Building A located along the Jefferson Boulevard frontage of up to 106,737 sf; and a 6-story Building B located interior to the project site, of up to 112,041 sf. The proposed project site is currently zoned M1-1VL (limited industrial, height limited to 45 feet/3-stories). The project would have a floor area ratio (FAR) of 1.37:1.

The proposed project would provide up to 2,200 sf of restaurant/retail (coffee shop) use with a drive-thru lane, up to 53,762 sf of light manufacturing (coffee roasting) use, up to 50,775 sf of warehouse space, and up to 90,054 sf of corporate headquarters office space, with ancillary lobby and covered outdoor balconies. In accordance with City of Los Angeles Municipal Code (LAMC), the proposed project would provide up to 828 vehicle parking spaces in a surface parking lot and two subterranean parking structures, as well as 21 short-term and 40 long-term bicycle parking spaces. The applicant is requesting a Zone Change/Height District Change from M1-1VL to M1-1; Site Plan Review, Waiver of Dedication and Improvement; and any addition actions including but not limited to, street tree removal, demolition, grading, excavation, haul route, and building permits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
6000 Jefferson BH, LLC
9641 South.Santa Monica Boulevard
Beverly Hills, CA 90210

FINDING:
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, 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 THIS FORM	**TITLE**	**TELEPHONE NUMBER**
JoJo Pewsawang	City Planner	(213) 978-1214

ADDRESS	**SIGNATURE (Official)**	**DATE**
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		11/5/18

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

INITIAL STUDY

The Coffee Bean & Tea Leaf

Case Number: ENV-2018-3451-MND

Project Location: 6024-6034 W. Jefferson Boulevard, Los Angeles, California, 90016

Community Plan Area: West Adams-Baldwin Hills-Leimert

Council District: 10 – Herb J. Wesson, Jr.

Project Description:

The proposed project is located on a 3.672 acre site in Los Angeles, California at 6024-6034 W Jefferson Boulevard. The proposed project is intended to provide corporate headquarters office, manufacturing, and warehouse facilities for "The Coffee Bean & Tea Leaf" inclusive of a coffee bean roasting space and viewing area, and a drive-thru retail (coffee shop) component. The development consists of two buildings totaling 218,778 square feet of floor area. Surface and subterranean parking would be provided with up to 828 spaces.

Building A, fronting W Jefferson Boulevard, would have up to 106,737 square feet of floor area and would be three stories tall with a maximum height of 50 feet. Building B, in the interior of the site, would have up to 112,041 square feet of floor area, and would be six stories tall with a maximum height of 85 feet. The project would have a total floor area ratio (FAR) of 1.37:1.

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

PREPARED BY:
Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101

APPLICANT:
6000 Jefferson BH, LLC
9641 S. Santa Monica Boulevard
Beverly Hills, CA 90210

September 2018

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CITY OF LOS ANGELES

INITIAL STUDY

Executive Summary

Date: September 27, 2018

Project Title:	**6024 Jefferson Project**
Environmental Case Number:	**ENV-2018-3451-EAF**
Related Cases:	**CPC-2018-3450-ZC-HD-SPR-WDI**
Project Location:	**6024-6034 W. Jefferson Boulevard Los Angeles, CA 90016**
Community Plan Area:	**West Adams-Baldwin Hills-Leimert**
Council District:	**CD 10 – Herb J. Wesson, Jr.**
Lead City Agency:	**City of Los Angeles Department of City Planning**
Staff Contact Name:	**JoJo Pewsawang**
Staff Contact Address:	**200 N. Spring Street, Room 763, Los Angeles, CA 90012**
Staff Contact Phone:	**213-978-1214**
Applicant Name:	**6000 Jefferson BH, LLC**
Applicant Address:	**9641 S. Santa Monica Boulevard Beverly Hills, CA 90210**
Applicant Contact Name:	**Brad Rosenheim/Heather Waldstein**
Applicant Contact Address:	**21600 Oxnard Street, Suite 630 Woodland Hills, CA 91367**
Applicant Contact Phone:	**818-716-2767**
General Plan designation:	**Limited Industrial**
Zoning:	**M1-1VL**

PROJECT DESCRIPTION:

The proposed project is an infill commercial development.

The development consists of two buildings; Building A would front W Jefferson Boulevard and be built to a maximum height of 50 feet with 3 floors and 106,737 square feet of floor area, and Building B would be at the interior of the property and be built to a maximum height of 85 feet with 6 floors and 112,041 square feet of floor area. The project would include outdoor plaza and garden areas, and off-street parking with surface and garaged parking totaling up to 828 vehicle spaces.

The proposed project would provide up to 2,200 sf of restaurant/retail (coffee shop) use, up to 53,762 sf of light manufacturing (coffee roasting) use, up to 50,775 sf of warehouse space, and up to 90,054 sf of corporate office space. Building B would also have approximately 13,052 sf of outdoor balcony space and 8,935 sf of lobby area. The project would have a floor area ratio (FAR) of 1.37:1.

(For additional details, see “Section II – Project Description”).

ENVIRONMENTAL SETTING:

The project site is located at 6024-6034 W Jefferson Blvd in the West Adams-Baldwin Hills-Leimert Community Plan Area. The project site is approximately 3.67 acres with approximately 159,971 square feet (sf) of surface land area. The site fronts two streets: the north side of the property fronts W. Jefferson Boulevard (approximately 263 feet of frontage), and the south and rear of the property fronts Bowcroft Street (approximately 50 feet of frontage). An existing 20' wide pipeline easement (to accommodate subterranean infrastructure) runs across the width of the frontage along Jefferson Boulevard; an additional easement of approximately 3,500 square feet reserved as a temporary staging area the for Chevron Corporation is located on the southeastern corner of the project site.

The site is currently vacant, and largely unpaved. Limited vegetation is present on the project site, however, there are 39 trees located on the project site; all of the trees are common, ornamental/non-native species.

The project site is located approximately 1.1 miles from the Santa Monica Freeway (Interstate-10 [I-10]), and 2.5 miles from the San Diego Freeway (Interstate-405 [I-405]). Surrounding properties within the City of Los Angeles fall within the M1-1VL Zone (limited industrial, height limited to 45 feet/3-stories); surrounding properties within the City of Culver City fall within the Industrial General and Open Space Zones. The properties in the vicinity of the project site are generally characterized by sloping topography, industrial and commercial uses, and open space. There are no residential uses in proximity to the project site. The Ballona Creek channel runs parallel to W Jefferson Blvd on the opposite side of the street from the project site, and the Baldwin Hills Scenic Overlook is located to the south and southwest of the project site.

(For additional detail, see "Section II, Part B – Environmental Setting").

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

Yes. Consultation is scheduled for October 24, 2018

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.): None

Environmental Factors Potentially Affected:

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

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

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Nicholas Hendricks	Senior City Planner
PRINTED NAME	**TITLE**
	(213) 978-1383
SIGNATURE	**TELEPHONE NUMBER**

Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less 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.

I. INTRODUCTION

The subject of this Initial Study is the construction of a corporate headquarters complex comprised of corporate office space, warehouse, manufacturing, drive-thru retail, outdoor plaza and garden space, and associated surface and garage parking, in the West Adams-Baldwin Hills-Leimert Community Plan Area of the City of Los Angeles. A full description of the project is contained in **Section II (Project Description)**. The City of Los Angeles is the Lead Agency under the California Environmental Quality Act (CEQA).

PROJECT INFORMATION

Project Title:	The Coffee Bean & Tea Leaf Corporate Headquarters
Project Location:	6024-6034 W. Jefferson Blvd Los Angeles, CA 90016
Project Applicant:	6000 Jefferson BH, LLC 9641 S. Santa Monica Boulevard Beverly Hills, California 90210
Lead Agency:	City of Los Angeles Department of City Planning 200 N. Spring Street, Room 763 Los Angeles, CA 90012

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into five sections as follows:

Executive Summary: This section provides an overview of the proposed project.

Introduction: This section provides introductory information such as the project title, the project applicant and the lead agency for the project.

Project Description: This section provides a detailed description of the environmental setting and the project, including project characteristics and environmental review requirements.

Environmental Checklist and Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. Potentially significant effects identified in the Initial Study Checklist will be evaluated further in the EIR.

Preparers of the Initial Study: This section provides a listing of those involved in the preparation of this Initial Study

II. PROJECT DESCRIPTION

A. PROJECT SUMMARY

The proposed Coffee Bean and Tea Leaf Project (proposed project) is intended to provide corporate headquarters office, manufacturing, and warehouse facilities for "The Coffee Bean & Tea Leaf" inclusive of a coffee bean roasting space and viewing area, and a drive-thru retail component. The development consists of two buildings totaling 218,778 square feet of floor area in two buildings, a 3-story Building A located along the Jefferson Boulevard frontage of up to 106,737 sf; and a 6-story Building B located interior to the project site, of up to 112,041 sf. The proposed project site is currently zoned M1-1VL (limited industrial, height limited to 45 feet/3-stories). The project would have a floor area ratio (FAR) of 1.37:1.

The proposed project would provide up to 2,200 sf of restaurant/retail (coffee shop) use with a drive-thru lane, up to 53,762 sf of light manufacturing (coffee roasting) use, up to 50,775 sf of warehouse space, and up to 90,054 sf of corporate headquarters office space, with ancillary lobby and covered outdoor balconies. In accordance with City of Los Angeles Municipal Code (LAMC), the proposed project would provide up to 828 vehicle parking spaces in a surface parking lot and two subterranean parking structures, as well as 21 short-term and 40 long-term bicycle parking spaces. Building B would include approximately 13,052 sf of outdoor balcony space.

The proposed project would provide two plaza areas; one 3,290 sf plaza along the Building A Jefferson Boulevard frontage for public use, and one 18,905 sf plaza and garden area between Building A and Building B for employee use.

B. ENVIRONMENTAL SETTING

1. Project Location

The project site is located at 6024-6034 West Jefferson Boulevard in the West Adams-Baldwin Hills-Leimert Community Plan Area of the City of Los Angeles (City), see **Figure II-1, Regional and Project Vicinity Map**. The site is bounded by Ballona Creek, and warehouses and industrial facilities on the north, the Baldwin Hills Scenic Overlook on the south and west, and commercial/industrial development on the east. As illustrated in **Figure II-2, Aerial View of Project Site**, the closest residential development is located approximately 1,000 feet northwest

of the project site (in Culver City) and 1,500 feet southeast (in the City of Los Angeles). Industrial buildings and warehouses are located immediately east of the project site.

Regional access to the project site is provided by the Santa Monica Freeway (I-10) located approximately 1.1 miles to the north, and the San Diego Freeway (US 405) located approximately 2.5 miles to the west. The project site is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) local lines (Lines 105 and 217) Metro rapid lines (Line 705), and Culver CityBus (Lines 4 and 5).

The project site is also proximate (0.8 mile) to the La Cienega and Jefferson Metro Expo Line Station, locating it just outside of a designated Transit Priority Area (TPA). A TPA is defined as an area within one-half mile of a major transit stop that exists or is planned. Section 21064.3 of the California Public Resources Code (PRC) defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. .

2. Existing Conditions

The project site is approximately 3.67 acres (159,971 sf). The site fronts two streets: the south side of Jefferson Boulevard (approximately 263 feet of frontage), and the northeast side of Bowcroft Street (approximately 50 feet of frontage). An existing 20’ wide pipeline easement (to accommodate subterranean infrastructure) runs across the width of the frontage along Jefferson Boulevard; an additional easement of approximately 3,500 square feet reserved as a temporary staging area the for Chevron Corporation is located on the southeastern corner of the project site. The site is currently vacant. Vegetation on the project site is limited to ruderal (weedy) undergrowth and 39 trees, mainly located at the back of the project site, none of these trees are in the public right-of-way. All of the trees are common, ornamental/non-native species (38 *Eucalyptus* species and one *Ficus* species) and thus are not protected as defined under Los Angeles Municipal Ordinance 177,404 (also known as the ‘Protected Tree Ordinance’).[1] Refer to **Existing Project Site Condition Figures II-3** through **II-6.**

The project site is located in the West Adams-Baldwin Hills-Leimert Park Community Plan Area. The project site is designated in the community plan for Limited Industrial land uses, and zoned M1-1VL. The total floor area allowed in all the main buildings on a lot in this zone is limited to

[1] *For further information please refer to the Tree Disposition Plan provided by Gaudet Design Group, ‘6024-3034 West Jefferson Blvd., Los Angeles, CA (APN: 4204-008-076, dated June 11, 2018, included as Appendix A to this Initial Study.*

one-and-one-half times the buildable area of the lot (1.5:1 Floor Area Ratio – (FAR)) and limited to 45 feet/3-stories by Height District 1VL.[2] The project site is legally described as Lot PT 14, Arbs 3 of Tract Subdivision of the Southern Portion of the Rancho Rincon De Los Bueyes.

The site is located in ZI-2374, the Los Angeles State Enterprise Zone, which, according to the California Association of Enterprises Zones website, "targets economically distressed areas throughout California".

3. Surrounding Land Uses

Surrounding properties within the City of Los Angeles fall within the M1-1VL Zone; surrounding properties within the City of Culver City fall within the Industrial General and Open Space Zones. The properties in the vicinity of the project site are generally characterized by sloping topography, industrial and commercial uses, and open space. There are no residential uses in proximity to the project site. The following sections provide information on the properties in the immediate vicinity of the proposed project site.

- Jefferson Boulevard bounds the project site to the north. The property across Jefferson Boulevard is Ballona Creek; it is located within the jurisdiction of the City of Culver City, it is zoned as Open Space, and it is under the Ballona Creek Overlay.

- An industrial building is located to the west of the project site. The property is within the jurisdiction of the City of Los Angeles, it is zoned M1-1VL, and the single industrial building on the site is currently occupied by a dry-cleaning business.

- The Baldwin Hill Scenic Overlook is located to the southwest of the project site. The property is located within the jurisdiction of the City of Culver City, and is zoned as Open Space.

- A single-story industrial office space is located to the southeast of the project site. The property is within the jurisdiction of the City of Los Angeles, and it is zoned M1-1VL.

- Improved single-story industrial office and manufacturing buildings are located to the east of the project site. These properties are within the jurisdiction of the City of Los Angeles, and are zoned M1-1VL.

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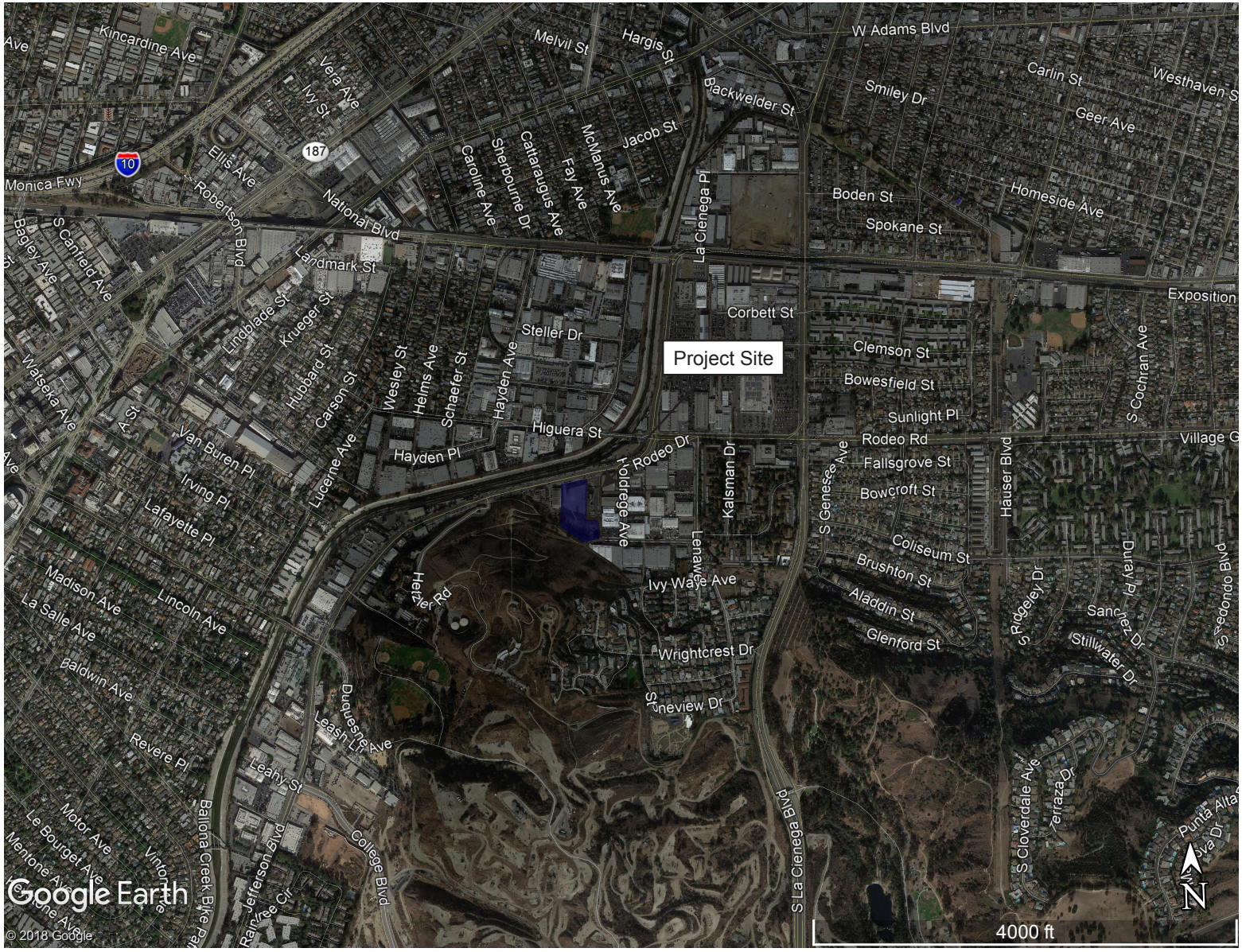
[2] *City of Los Angeles Municipal Code, Comprehensive Zoning Plan of the City of Los Angeles. 2018.*



SOURCE: Google Earth, 2018

FIGURE **II-1**

IMPACT SCIENCES

Regional and Project Vicinity Map

1322.001•07/18

SOURCE: Google Earth, 2018

FIGURE **II-2**

Aerial View of Project Site

IMPACT SCIENCES

1322.001•07/18

SOURCE: Coffee Bean & Tea Leaf, 2018

FIGURE **II-3**

IMPACT SCIENCES

Project Site Photo, Looking South from Jefferson Boulevard

SOURCE: Coffee Bean & Tea Leaf, 2018

FIGURE **II-4**

IMPACT SCIENCES

Project Site Photo, Looking Southeast from Jefferson Boulevard

SOURCE: Coffee Bean & Tea Leaf, 2018

FIGURE **II-5**

IMPACT SCIENCES

Project Site Photo, Looking East from Jefferson Boulevard

1322.001•07/18

SOURCE: Coffee Bean & Tea Leaf, 2018

FIGURE **II-6**

IMPACT SCIENCES

Project Site Photo, Looking West from Jefferson Boulevard

1322.001•07/18

C. DESCRIPTION OF PROJECT

PROJECT OVERVIEW

The proposed project consists of the development of a 218,778 square-foot corporate headquarters complex, including The proposed project would include a drive-thru restaurant/retail (coffee shop) use, light manufacturing (coffee roasting) use, warehouse space, and corporate office space within two separate buildings on the project site.

"Building A", approximately 106,737 square feet of floor area, would be located along the W Jefferson Boulevard frontage and built to a maximum height of 50 feet, with 3-stories. "Building B", approximately 112,041 square feet of floor area, would be located to the interior of the site and built to a maximum height of 85 feet, with 6-stories (inclusive of two partial levels of above grade parking, over three levels of subterranean parking). The two buildings would be separated by a ground floor outdoor plaza and garden area located mid-site; an additional ground floor outdoor plaza would be located along Jefferson Boulevard adjacent to Building A.

Access to and from the proposed project site would be provided via three driveways. There would be an ingress/egress full access driveway approximately 30 feet wide at the northeast corner of the proposed project site along Jefferson Boulevard to serve as the main vehicular entrance/exit and loading exit. There would also be an egress driveway approximately 20 feet in width at the northwest corner along Jefferson Boulevard dedicated for the drive-thru establishment exit, and an ingress/egress approximately 30 feet wide along Bowcroft Street serving as a secondary vehicular entrance/exit and loading entrance.

The proposed project would provide up 828 parking spaces, well over the 382 automobile parking spaces required per LAMC Section 12.21-A,4, and would not seek any bicycle replacement as permitted under LAMC Section 12.21 A.4. Off-street automobile parking spaces would be provided above, at, and below grade. Approximately 22 automobile parking spaces would be provided at grade along the eastern property line adjacent to Building A, with disabled access to the plaza and retail shop. The remaining automobile parking spaces would be provided within a three-level subterranean parking structure below Building A (411 spaces), and the parking structure of Building B on two above ground levels and three subterranean levels (395 spaces). The proposed project requires a total of 21 short term bicycle parking spaces and 40 long term bicycle parking spaces. The short term bicycle parking spaces would be located along the Jefferson Boulevard frontage of Building A in the plaza area, and the long term bicycle storage area would be located on level P3 of the subterranean parking garage of Building B.

Two plaza areas would be provided on the project site: a 3,290 sf plaza area along the Jefferson Boulevard frontage of Building A open to the public, and a 18,905 sf main plaza and garden area located between Buildings A and B for employee use.

1. Design and Architectural Features

The proposed buildings would be designed in a modern style. The proposed project would exhibit design and architectural features friendly to pedestrians, and with scale and massing consistent with the surrounding industrial and open space context.

The proposed project includes a wide range of design and architectural features intended to present a visually diverse and pedestrian-scale environment. The design would use architectural details and varied building materials and trims, and would avoid the use of highly reflective materials and finishes that may cause glare or heat. The proposed project buildings would maintain a human scale. At entrances and openings, the buildings would have overhead architectural features like awnings, canopies, trellises, or cornice treatments. The buildings would have varied visual facades and massing between ground floors and upper floors and along building facades to avoid creating large walls and empty spaces.

The proposed project's general features include:

- Massing intended to feel visually at a pedestrian scale and avoid a dominating posture;
- A ground floor that is appropriate for the restaurant/retail space for members of the public; and,
- Varied building façade materials, including glass, wood, and exposed concrete.

The proposed project was designed with consideration for the land use and urban design goals and policies in the West Adams-Baldwin Hills-Leimert Community Plan, and in alignment with the City of Los Angeles Industrial Citywide Design Guidelines checklist. Key design and architectural elements include:

Consideration of Neighborhood Context and Compatible Design of Uses

- Creates a strong street wall by locating Building A along the street frontage at the front of the property line;
- Provides direct paths of travel for pedestrian destinations within the site;
- Places Building A and Building B around a central common space;
- Provides bicycle lockers and/or racks near building entrances;
- Provides safeguards to control toxic substances and airborne particles;
- Orients buildings to maximize daylighting;
- Includes multiple entryways for each building;
- Is organized logically for arrival, circulation, and exit from the site;
- Provides appropriate scale entryways;

- Ensures equal access for primary and main entry approaches;
- Places entrances at grade and in view of public areas;
- Maintains compatible scale, massing, and style for buildings with existing and surrounding uses; and,
- Includes visual transitions between industrial and commercial areas within and adjacent to the site.
- Employ High Quality Architecture to Define the Character of Industrial Districts

The project would provide approximately 2,200 sf of restaurant/retail (coffee shop) use on the ground floor of Building A fronting W. Jefferson Boulevard. The restaurant/retail area fronting Building A would include a plaza and seating area adjacent to the restaurant/retail space available for use by restaurant/retail patrons or office workers in the facility. The restaurant/retail space would include a drive-thru; the drive-thru is anticipated to be open every day of the week, including weekends, between the hours of 5:00 AM to 12:00 AM.

The manufacturing area and warehouse space within Building A would be oriented toward the interior of the project site, facing the interior plaza and garden area. The project would include exclusive commercial storage and trash/recycling areas within the project. These areas would be screened to prevent any impacts or odors to nearby sensitive receptors and residents.

2. Open Space and Landscaping

The proposed project does not include residential uses and will not require the provision of Open Space. However, the proposed project incorporates two landscaped outdoor plaza areas. The outdoor plaza located adjacent to the north side of Building A would be 3,290 square feet in size and would provide shaded outdoor seating areas open to the general public. The “upper” outdoor plaza area located between Buildings A and B, sits at a higher elevation on the proposed project site offering views over the property, Jefferson Boulevard and beyond. This landscaped/hardscaped outdoor plaza would provide shaded seating, a fire pit, and water features in an approximately 18,905 square-foot area, for use by employees and corporate visitors.

The drive-thru lane along Jefferson Boulevard is separated from Jefferson by an approximately 25-foot wide landscaped buffer, inclusive of an approximately 20-foot wide existing pipeline easement (to accommodate subterranean infrastructure). Additional landscaping would screen a 6-foot perimeter wall on the western edge of the project site, and a smaller perimeter wall on the eastern edge of the project site designed to match the existing wall. Vegetative plantings would consist of screening, accent, and decorative trees, shrubs, and grasses, including Italian cypress, fruitless olive, coast live oak, Mexican fan palm, cork oak, lemon scented gum tree, white crape myrtle, orange clivia, and other accent plans, underplanting, and grasses.

3. Access, Circulation, and Parking

The proposed project would provide up 828 parking spaces, well over the 382 automobile parking spaces required per LAMC Section 12.21, and would not seek any bicycle replacement as permitted under LAMC Section 12.21 A.4. Off-street parking spaces would be provided above, at, and below grade. Approximately 22 parking spaces would be provided at grade along the eastern property line adjacent to Building A, providing disabled access to the plaza and the coffee shop. The remaining parking spaces would be provided within the parking structures, a three-level subterranean structure beneath Build A, and two above ground levels and three subterranean levels as part of Building B.

Taking advantage of the steep topography, Building B would be built into the hillside providing subterranean and partially subterranean parking beneath the office building on levels P3-P6. The building would have two partial levels of above ground parking, a double height ground floor lobby and one partial subterranean parking level (P3).

The proposed project would include 61 (21 short-term and 40 long term) bicycle parking spaces. The short-term bicycle parking spaces would be located along the Jefferson Boulevard frontage of Building A in the plaza area. The long-term bicycle storage area would be located on level P3 of the subterranean parking garage for Building B.

Access to and from the proposed site would be provided via three driveways:

- An ingress/egress approximately 30’ wide full access driveway at the northeast corner of the project site along W Jefferson Boulevard (main vehicular entrance/exit and loading exit);
- An egress driveway approximately 20’ in width at the northwest corner along Jefferson Boulevard, dedicated for the drive-thru establishment exit; and,
- An ingress/egress approximately 30’ wide full access driveway along Bowcroft Street (secondary vehicular entrance/exit and loading entrance).

The automobile entrance and exit to the parking structure in Building B would be located on level P3 (subterranean) with a ramp up to levels P1 and P2 of the above ground parking structure. A ramp down from P3 would provide access to the subterranean parking levels P4-P6.

Mobility Plan 2035 provides designations for the two streets which the project site fronts: Jefferson Boulevard and Bowcroft Street:

- Jefferson Boulevard – The Mobility Plan 2035 designates Jefferson Boulevard as an Avenue II. The portion of Jefferson Boulevard adjoining the project site along the north property line is designated to a half Right of Way (“ROW”) width of 43 feet and a half roadway width of 28 feet. Currently, the street is dedicated to a half ROW width of 50

feet with a half roadway width of 42 feet and is improved with paved street, curb, gutter, and an 8-foot wide sidewalk.

- Bowcroft Street – The Mobility Plan 2035 designates Bowcroft Street as a Local Street. The portion of Bowcroft Street adjoining the project site along the south property line is designated to a half ROW width of 30 feet, with a half roadway width of 18 feet. Currently, the street is dedicated to a half ROW width of 30 feet, and is partially improved with paved street, curb, gutter, and sidewalk.

4. Lighting and Signage

Project site signage would include building identification, commercial retail identification, wayfinding, and security markers. Commercial signage would utilize glare-free fixtures to compliment architectural features and reduce the potential for light spillover; no off-site signage is proposed. General lighting would include streetlights on Jefferson Boulevard and Bowcroft Street, wall-washers and other similar architectural surface lighting along the building elevations, and decorative lighting within the pedestrian plazas and seating areas. Pedestrian areas would be well-lighted for security. Project lighting would also include visible interior light within the ground-level commercial and manufacturing uses.

5. Site Security

Design Out Crime/Crime Prevention through Environmental Design

Through the City's land use and building permit process, the LAPD's Crime Prevention Unit provides guidance on design techniques for new developments to incorporate crime prevention into the development design. The techniques and process is outlined in the Design Out Crime Guidelines: Crime Prevention Through Environmental Design, and includes the following basic concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

The project's employees and customers will add "eyes on the street" that would help reduce crime. Additionally, the street facing ground floor café use would increase activity on the street frontage and provide transparency in an area formerly characterized by a vacant lot and industrial buildings.

The proposed project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments.

Closed circuit television (CCTV) cameras would be mounted on the building exterior, in the building lobbies and plazas at street level, and throughout all levels of the parking garages that would record activity on the property at all times.

6. Sustainability Features

CALGreen Building Code

The 2016 California Green Building Standards Code, referred to as CALGreen, became effective on January 1, 2017. CALGreen sets minimum standards that all new structures must meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new CALGreen standards. The CALGreen Standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs.

CALGreen also has more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds (VOCs), and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two-tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The non-residential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

CALGreen addresses the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure. The mandatory CALGreen measures would be inspected and verified by local building departments, in this case the City of Los Angeles Department of Building and Safety (LADBS), using special inspectors as they determine necessary.

The project would be designed to meet the latest in California/Uniform building codes, Title 24, and CALGreen. Each of the units would maximize the indoor environmental quality with the inclusion of ENERGY STAR(®)[3] air conditioning with fresh air intake, natural cross ventilation, exhausting kitchen hood and fans, no VOC paints, natural flooring, and formaldehyde free cabinetry, counters, and shelving. All bathroom and plumbing fixtures would be water-conserving fixtures. Overall energy efficiency would be maximized with ENERGY STAR rated appliances, advanced lighting, dual glazed windows with low-e coating[4], and energy efficient thermal building envelope.

In accordance with new CALGreen requirements, the project would include the required 15 percent of the total roof areas as solar-ready, with thermal hot water panels and collectors as part of the base building design. In addition, the parking garage would include a minimum of 10 percent of the parking spaces with dual-port electric vehicle charging stations.

Los Angeles Green Building Code

The City of Los Angeles implemented Ordinance No. 184,691 as the most recent update to the Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code is based on the 2016 CALGreen code as discussed above. As a new building, the proposed project is subject to the LA Green Building Code.

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

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Installation of a vegetated green roof at certain locations to reduce urban heat island effect and reduce and filter stormwater run-off
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;

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[3] *The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure to intended reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.*

[4] *Low-e coatings have been developed to minimize the amount of ultraviolet and infrared light that can pass through glass without compromising the amount of visible light that is transmitted in order to reduce the amount of heat gain/loss on the interior of a building.*

- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Enhanced refrigerant management;
- Use of energy efficient lighting;
- Use of ENERGY STAR appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems; and
- Provision of electric vehicle charging stations in the parking structure.

Anticipated Construction Schedule

Grading and construction of the proposed project is anticipated to begin in January 2019, with project completion estimated in approximately 35 months; some construction activities would take place concurrently. The proposed construction sequence is anticipated as follows:

- Grading and Site prep: 7 months
- General Construction: 26 months, including,
    - concrete footings,
    - foundations,
    - retaining walls,
    - garage slab,
    - wood framing
    - Sheathing, insulation, and flashing
    - Roofing
    - Windows and openings
    - Exterior finish materials
    - Interior utility distribution
    - Interior partitions
- Finishes, fixtures and casework: 1 month
- Site work and landscaping: 1 month

The proposed project would require the net export of up to 79,000 cubic yards of material from the site. The proposed project would require a haul route permit, subject to the approval of the City of Los Angeles Department of Building and Safety. The likely haul route for the project would utilize Jefferson Boulevard to access the Santa Monica Freeway, with exported materials most likely disposed of at the Sunshine Canyon Landfill in Sun Valley.

Construction Parking

It is anticipated that construction worker parking and building material laydown during construction of the proposed project would take place on the project site.

D. REQUESTED PERMITS AND APPROVALS

Discretionary entitlements, reviews, and approvals required for implementation of the project would include, but would not necessarily be limited to, the following:

- **A Height District Change**, pursuant to LAMC Section 12.32 F, to allow for a height district change from "1VL" to "1" allowing for a maximum building height of 50 feet pursuant to LAMC Section 12.21.1 B.3(a) for Building A and a maximum building height of 85 feet pursuant to LAMC Section 12.21.1 B.3(a) for Building B;

- **Site Plan Review** findings, pursuant to LAMC Section 16.05, for a development project consisting of 50,000 square feet or more of nonresidential floor area, and a change of use to a Drive-Through Fast-food Establishment which results in a net increase of 500 or more average daily trips, and any change of use which results in a net increase of 1,000 or more average daily trips; and

- **Waiver of Dedication and Improvement** findings, pursuant to LAMC Section 12.37 I.3 to waive the anticipated 7-foot dedication and improvements, as potentially required per the Mobility 2035 Plan to widen the sidewalk along West Jefferson Boulevard to 15'.

- **Certification of an Initial Study / Mitigated Negative Declaration,** pursuant to the California Environmental Quality Act (CEQA); and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, storm water discharge permits, excavation permits, grading permits, foundation permits, building permits, exterior approvals, permits for driveway curb cuts, installation and hookup approvals for public utilities, landscaping approvals, and sign permits.

SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-7**

IMPACT SCIENCES

Building A Context

1322.001•09/18

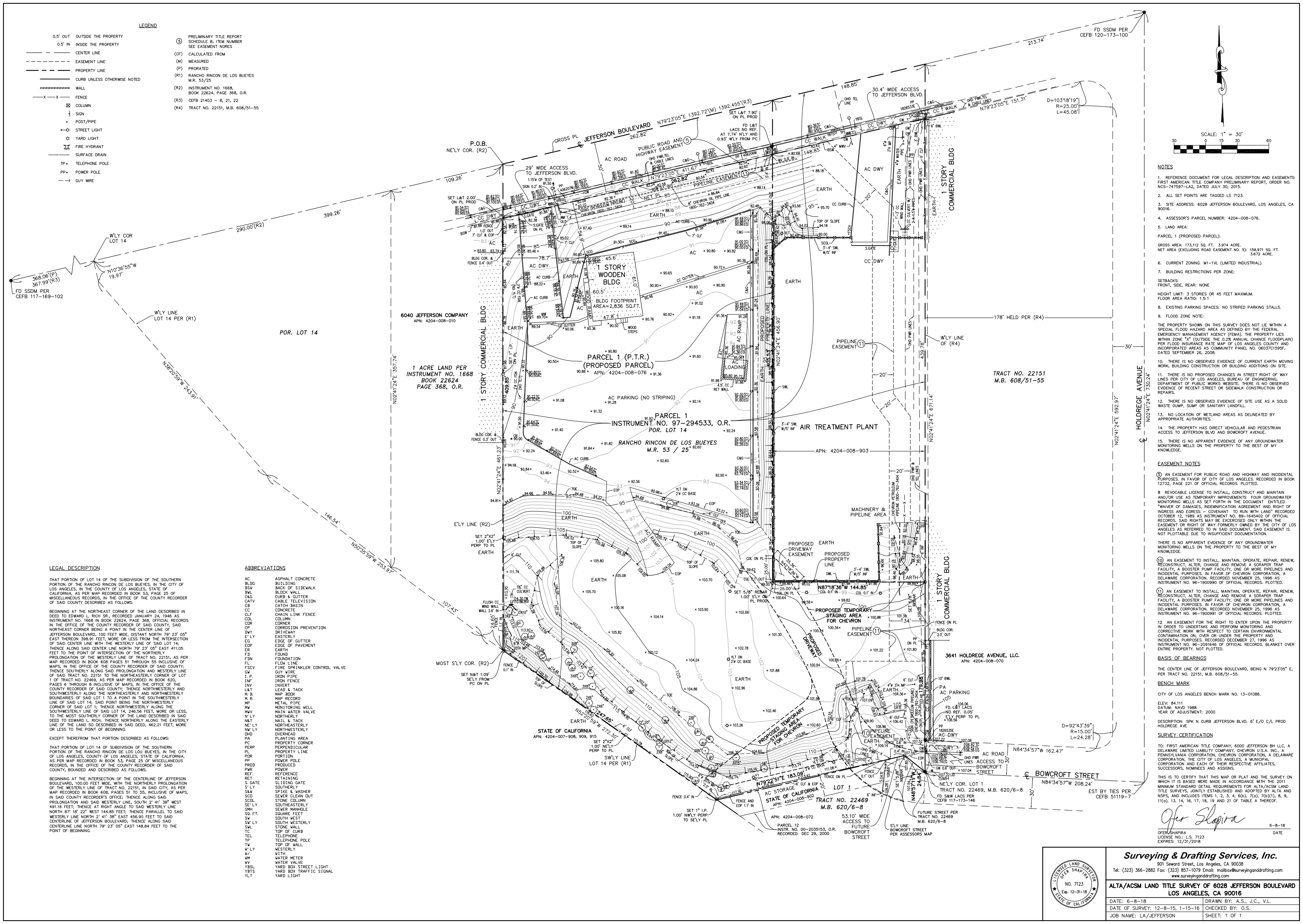
SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-8**

IMPACT SCIENCES

Building B Context

1322.001•07/18



SOURCE: Surveying & Drafting Services, Inc., 2018

FIGURE **II-9**

IMPACT SCIENCES

Project Site Survey

1322.001•07/18

PROPOSED PLANT PALETTE

	BOTANICAL NAME	COMMON NAME
TALL SCREEN PLANTING (24" BOX):		
	CUPRESSUS SEMPERVIRENS	ITALIAN CYPRESS
EVERGREEN NATURAL TREE GROUPING (24" BOX):		
	OLEA EUROPAEA 'SWAN HILL'	FRUITLESS OLIVE
	QUERCUS AGRIFOLIA	COAST LIVE OAK
PALM PLANTING: (15' BTH		
	WASHINGTONIA ROBUSTA	MEXICAN FAN PALM
LARGE PERIMETER TREES TREE (24" BOX):		
	QUERCUS SUBER	CORK OAK
TALL VERTICAL SCREEN TREE (24" BOX):		
	EUCALYPTUS CITRIODORA	LEMON SCENTED GUM TREE
LARGE SPECIMEN OAK TREES (36" BOX):		
	QUERCUS AGRIFOLIA	COAST LIVE OAK
COURTYARD TREES(24" BOX): N.A.P.		
	LAGERSTROEMIA IND. 'NATCHEZ'	WHITE CRAPE MYRTLE
	OLEA EUROPAEA 'SWAN HILL'	FRUITLESS OLIVE
SHADE PLANTING (5 GALLON):		
	CLIVIA MINIATA	ORANGE CLIVIA
ACCENT PLANTING (5 GALLON):		
	AGAVE SPECIES	AGAVE
	ALOE SPECIES	ALOE
LAYERED PLANTING (5 GALLON):		
	BOUGAINVILLEA 'TEMPLE FIRE'	BOUGAINVILLEA GROUNDCOVER
	CEANOTHUS HORIZONTALIS	CARMEL CREEPER
	LOMANDRA LONGIFOLIA BREEZE	DWARF MAT RUSH
	MAHONIA REPENS	CREEPING BARBERRY
	OLEA EUROPAEA 'MONTRA'	LITTLE OLLIE DWARF OLIVE
	RHAMNUS CALIFORNICA	COFFEEBERRY
GRASSES (5 GALLON):		
	LOMANDRA LONGIFOLIA 'BREEZE'	NATIVE BENT GRASS
	FESTUCA SPECIES	FESCUE
MIXED UNDERPLANTING: (5 GALLON)		
	ACACIA COGNATA 'COUSIN ITT'	COUSIN ITT ACACIA
	CEANOTHUS HORIZONTALIS	CARMEL CREEPER
	CORDYLINE 'ELECTRIC PINK'	PINK VARIEGATED DRACAENA
	LAVANDULA X HETEROPHYLLA	SWEET LAVENDAR
	PROTEA 'PINK ICE'	PINK ICE PROTEA

OWNER:
THE COFFEE BEAN & TEA LEAF
ATTN: SUNNY M. SASSOON
6024-6034 W JEFFERSON BLVD
LOS ANGELES, CA
SSASSOON@COFFEEBEAN.COM

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LANDSCAPE CONSULTANTS:
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GAUDET DESIGN GROUP
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WEST LOS ANGELES, CA 90025
310.828.4908

BALDWIN HILLS SCENIC OVERLOOK

VICINITY MAP

NOTE:
SEE ARCHITECTURAL SHEETS FOR:
-PROJECT SUMMARY FOR OPEN SPACE CALCULATIONS.
-COLORED BUILDING RENDERINGS
-NO PROTECTED TREES ON SITE.

SOURCE: Gaudet Design Group, 2018

FIGURE **II-10**

Landscape Plan

VICINITY MAP

NOTES:
- FOR ADDITIONAL INFO REGARDING EXISTING CONDITIONS, SEE SURVEY PLANS
- EXISTING SURVEY, GRADES & CONDITIONS SHOWN FOR REFERENCE ONLY
- FOR EXTERIOR ELEVATIONS MARKS AND BUILDING SECTIONS CUTS, SEE SHEET A-5

SEE NORTH

GRAPHIC SCALE

30 20 10 0 15 30 60

(IN FEET)

SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-11**

Project Ground Floor Plan

IMPACT SCIENCES

SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-12**

Project Second Floor Plan

IMPACT SCIENCES

1322.001•09/18

SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-13**

Project Third Floor Plan

IMPACT SCIENCES

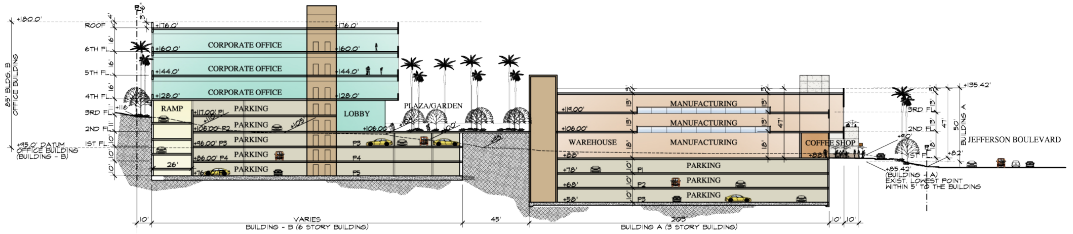
SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-14**

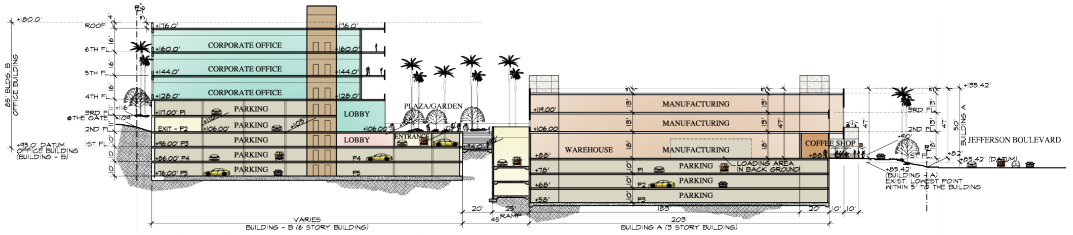
Project Basement Plan

IMPACT SCIENCES

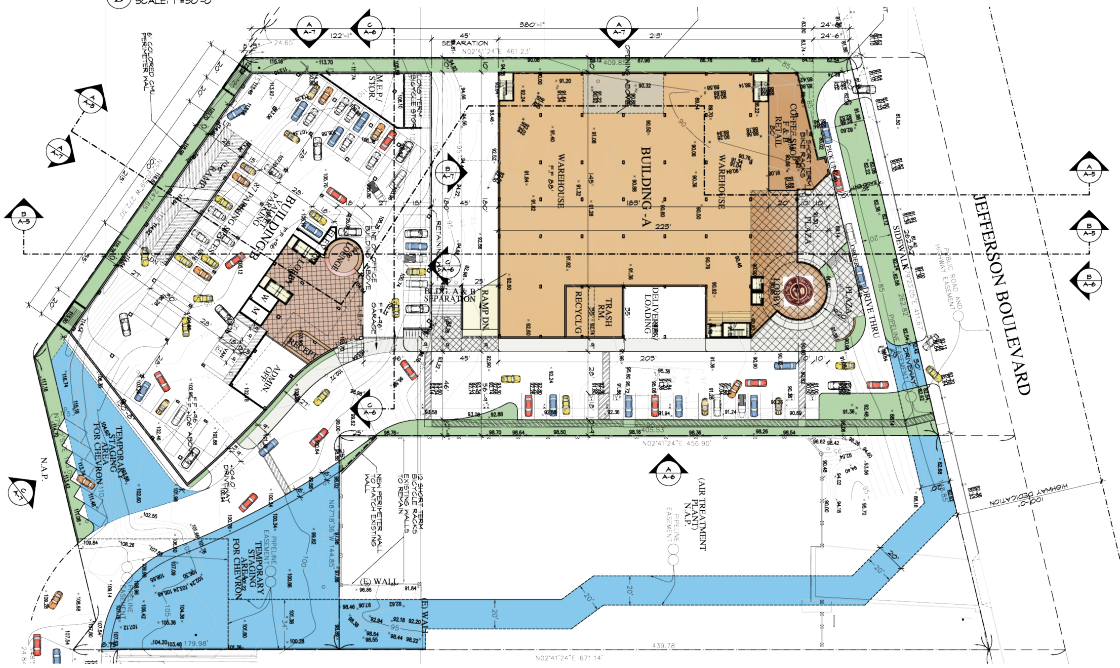
1322.001•09/18

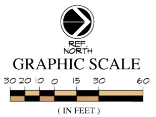


A SCHEMATIC LONGITUDINAL SECTION - A
SCALE: 1"=30'-0"



B SCHEMATIC LONGITUDINAL SECTION - B
SCALE: 1"=30'-0"





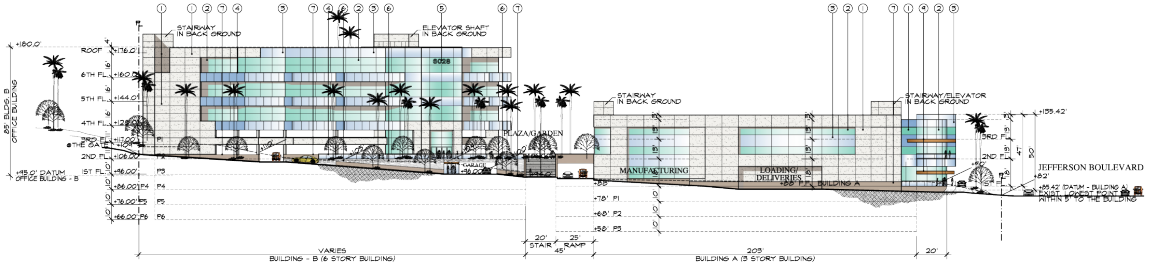
SOURCE: Jack Hollander & Associates, 2018

FIGURE **II-15**

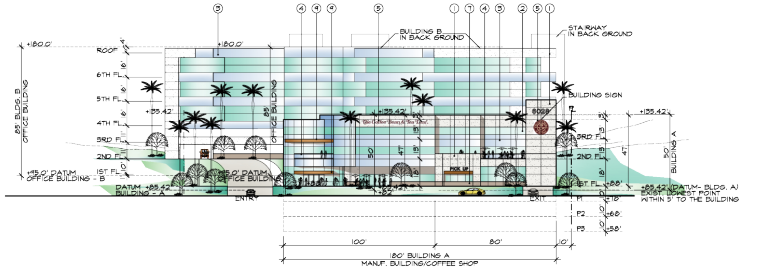
Schematic Project Sections

IMPACT SCIENCES

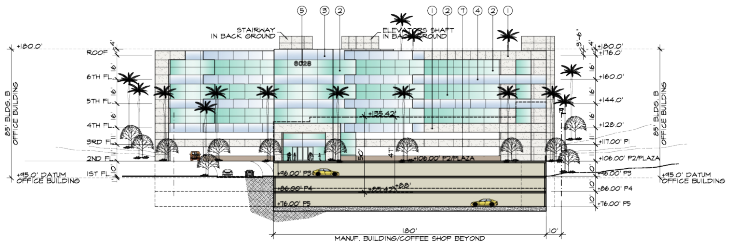
1322.001•09/18



A EAST ELEVATION
SCALE: 1"=30'-0"



B NORTH ELEVATION - BUILDING A -VIEW FROM JEFFERSON BOULEVARD
SCALE: 1"=30'-0"



C NORTH ELEVATION - OFFICE BUILDING (BUILDING B)
SCALE: 1"=30'-0"

VICINITY MAP

NOTES:
- BUILDING - A - 3 STORY BUILDING (DATUM= +85.42')
- BUILDING - B - 6 STORY BUILDING (DATUM= +115.00')
- DATUM = EXISTING LOWEST POINT WITHIN 5' TO THE BUILDING

KEYNOTES

1. SMOOTH EXTERIOR PLASTER COLOR AS SELECTED BY ARCHITECT
2. EXTERIOR STOREFRONT GLAZING COLOR AS SELECTED BY ARCHITECT
3. SPANDREL GLAZING COLOR AS SELECTED BY ARCHITECT
4. GLASS RAILING WITH S.S. SUPPORTS COLOR AS SELECTED BY ARCHITECT
5. BACKLIT STORE SIGNAGE
6. STONE VENEER COLOR AS SELECTED BY ARCHITECT
7. COLORED CONCRETE STEM-WALL COLOR AS SELECTED BY ARCHITECT
8. EXPANSION JOINT
9. METAL OVERHANG COLOR AS SELECTED BY ARCHITECT

REF: NORTH

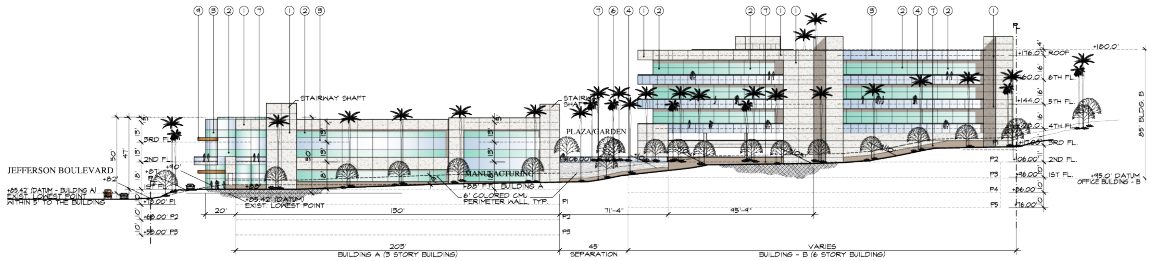
GRAPHIC SCALE
30 20 10 0 15 30 60
(IN FEET)

SOURCE: Jack Hollander & Associates, 2018

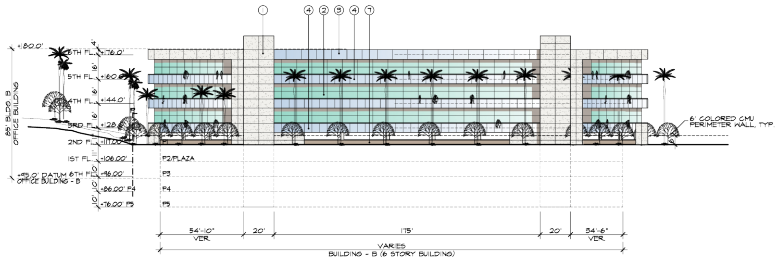
FIGURE **II-16**

Project North and East Elevations

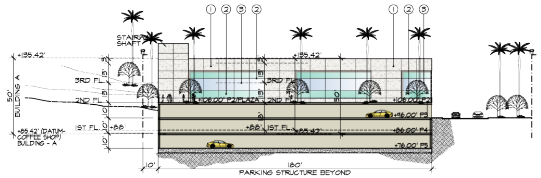
IMPACT SCIENCES



A WEST ELEVATION
SCALE: 1"=30'-0"



B BUILDING B (OFFICE BUILDING) - REAR ELEVATION
SCALE: 1"=30'-0"



C NORTH ELEVATION - OFFICE BUILDING
SCALE: 1"=30'-0"

VICINITY MAP

NOTES:
- BUILDING - A - 5 STORY BUILDING (DATUM= +85.42')
- BUILDING - B - 6 STORY BUILDING (DATUM= +85.00')
- DATUM = EXISTING LOWEST POINT WITHIN 5' TO THE BUILDING

KEYNOTES

1. SMOOTH EXTERIOR PLASTER, COLOR AS SELECTED BY ARCHITECT
2. EXTERIOR STOREFRONT GLAZING COLOR AS SELECTED BY ARCHITECT
3. SPANDREL GLAZING COLOR AS SELECTED BY ARCHITECT
4. GLASS RAILING WITH S.S. SUPPORTS COLOR AS SELECTED BY ARCHITECT
5. BACKLIT STORE SIGNAGE
6. STONE VENEER COLOR AS SELECTED BY ARCHITECT
7. COLORED CONCRETE STEM-WALL COLOR AS SELECTED BY ARCHITECT
8. EXPANSION JOINT
9. METAL OVERHANG COLOR AS SELECTED BY ARCHITECT

NORTH

GRAPHIC SCALE
30 20 10 0 15 30 60
(IN FEET)

SOURCE: Jack Hollander & Associates, 2018

FIGURE II-17

Project West and Rear Elevations

IMPACT SCIENCES

III. ENVIRONMENTAL CHECKLIST AND 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 Appendix G of the State CEQA Guidelines.

IMPACT ANALYSIS

1. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. 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?	☐	☐	☒	☐

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. The proposed project is located in the City of Los Angeles, in a generally industrial and commercial neighborhood of the City approximately 4,700 feet south of Interstate 10. The nearest scenic views or vistas to the project site is the Baldwin Hills Scenic Overlook; the view point for this California State Park is located on an elevated hill to the south of the proposed project site. The view point is approximately 900 feet to the southwest of the project site, and offers panoramic views of the Los Angeles Basin, surrounding mountains, and Pacific Ocean.

Although the proposed project is adjacent to this scenic vista, the scenic vista originates from a hill approximately 300 feet higher in elevation than the project site. The primary views from the scenic vista are of the urbanized Los Angeles area basin, mountains, and Pacific Ocean; these subjects are vast and distant from the origination point. The tallest building of the proposed

project would be 85 feet above ground level. Given the close distance between the scenic vista and the project site, and the significant difference in elevation between the scenic vista and the project site, the proposed project would not obstruct any portion of the viewshed.

The proposed project would change the existing view by adding two new structures. Scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The view from the Baldwin Hills Scenic Overlook would continue to provide expansive views of the Los Angeles basin, surrounding mountains, and Pacific Ocean with construction of the proposed project. Therefore, the proposed project would not block or otherwise impede an existing view of a scenic vista, and impacts would be less than significant; no further analysis is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The project site is not located along or near a state scenic highway. Currently, the only roadway identified in California Department of Transportation's (Caltrans) state scenic highway program that traverses the City of Los Angeles is a 6-mile segment of the Pasadena Freeway (also known as the Arroyo Seco Historic parkway) between downtown Los Angeles and Pasadena, which is identified as a "Historic Parkway."[1]

The project site is not located within a scenic corridor.[2] The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, as none of these resources exist on or near the project site. The proposed project would result in no impact on scenic resources within a state scenic highway. No further analysis is required.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. The proposed project would alter the existing visual character of the project site by changing the site from a vacant parcel to a commercial, restaurant/retail site with one three-story building and one six-story building. The project site does not currently possess high aesthetic value; it fronts a busy roadway in a commercial and industrial area, and is not in the vicinity of any residential uses. The construction of the proposed project would not be considered adverse,

The project site is in the West Adams-Baldwin Hills-Leimert Community Plan Area. According to the Community Area Plan, it is in the vicinity of a “Community Center (Transit-Oriented Development Area, Commercial Node) that is located along W Jefferson Boulevard to the northwest of the project site. Community Centers are defined as medium-scaled commercial

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1 *State of California Department of Transportation. California Scenic Highway Mapping System. 2015. Accessed July 2018 online at: http://www.dot.ca.gov/hq/tsip/gis/datalibrary/Metadata/ScenicHwys.html.*

2 *City of Los Angles West Adams-Baldwin Hills-Leimert Community Plan. 2017. Accessed July 2018 online at: https://planning.lacity.org/complan/central/wadpage.htm.*

areas that contain businesses found in neighborhood districts (like restaurants, retail outlets, grocery stores, childcare facilities, small professional offices, religious facilities or other neighborhood services), but also larger and higher intensity uses (like hotels, motels, offices, cultural and entertainment facilities, schools, or libraries). There is also a project area formerly under the jurisdiction of CRA/LA to the west, the Rodeo / La Cienega Redevelopment Project Area.

The immediate vicinity of the project site is occupied by limited industrial uses and open space areas (Baldwin Hills Scenic Overlook and Ballona Creek). The Community Plan describes the neighborhood in which the project site is located as "Limited Industrial." At three stories and six stories, the proposed buildings would be consistent with the general urban character of the surrounding area and the existing uses in the immediate vicinity of the project site (refer to Figures II-3 through II-6). The proposed project's design is a contemporary style that would be compatible with the more contemporary designs that have been incorporated in buildings constructed in the area over the past 10 years. Varying building materials are proposed, including steel panels and window frames, metal screens, corrugated metal skin, concrete structure, and storefront walls. The building design was developed with consideration for various design themes, including complete neighborhoods, pedestrian activity, and sustainable development. The design is consistent with the Citywide Design Guidelines, and the City of Los Angeles Do Real Planning Principles. It is also consistent with the City of Los Angeles' 2016 Industrial Citywide Design Guidelines. Refer to Appendix B of this Initial Study for the Checklist for Project Submittal submitted to the Department of City Planning (DCP) demonstrating that the proposed project is substantially consistent with the applicable design requirements for site planning, building orientation, entrances, relationship to adjacent buildings, pedestrian scale, building façade and form, building materials, storefront character, sidewalks, on-street parking, off-street parking and driveways, on-site landscaping, open space and plazas, building signage and placement, building signage materials, lighting and security, and utilities. Furthermore, the proposed landscaping would include trees, on-site ornamental landscape elements, including, trellises, and planters that would soften the visual character of the proposed structure at ground level. Given the proposed project consistency with the Citywide Design Guidelines and Planning Principles, impacts to the visual quality and character of the project site and surroundings would be less than significant; no further analysis is required.

Shade and Shadow

Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. However, the L.A. CEQA Thresholds Guide considers the screening question above regarding visual character or quality of a site and its surroundings as including shading impacts. According to the Guide, a project would normally have a potentially significant impact if:

> **Shadow-sensitive uses would be shaded more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between early November and mid-March or more than four hours between the hours of 9:00 A.M.**

and 5:00 P.M. Pacific Daylight Time (PDT) between mid-March and early November.

According the L.A. CEQA Thresholds Guide, consequences of shadows upon land uses may be positive, including cooling effects during warm weather, or negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Shadow effects are dependent upon several factors, including the effects on facilities and operations sensitive to the effects of shading. These include routinely useable outdoor spaces associated with residential, recreational, or institutional uses, such as schools and convalescent homes. Commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors are also considered shade-sensitive. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

The existing use to the south is the Baldwin Hills Scenic Overlook, elevated on a hill approximately 300 feet higher than the project site. To the west is an industrial building currently occupied by a dry cleaning facility. To the north across W Jefferson Boulevard, the Ballona Creek channel runs parallel to W Jefferson Boulevard. The sites to the south and east of the project site are improved with industrial office, manufacturing, and warehouse uses, home to large studios and corporate headquarter offices.

The proposed project would have the potential to cast shadows on areas within the site; however, given the nature of the surrounding light industrial and manufacturing uses, the proposed building locations on the western edge of the property, and the project site's proximity to the elevated Baldwin Hills Scenic Overlook to the south, the shadows cast by the new buildings would only incrementally increase the shadow and shade in the area, would not shade or shadow any existing sensitive uses, and impacts would be less than significant.

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

Less than Significant Impact. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The project site is currently zoned for limited industrial use, and is located in an urban environment characterized by high levels of ambient nighttime illumination. However, nighttime illumination levels are not high at the project site, which does not involve any nighttime activity or illumination. The Baldwin Hills Scenic Overlook would be sensitive to bright point-source

lighting and glare; it is located approximately 500 feet southwest of the project site, and the overlook point is located on a hill at an elevation approximately 300 feet above the project site elevation.

The proposed use at the project site, including the presence of a retail/commercial use along W Jefferson Boulevard, would increase the nighttime illumination on the project site from current levels. Lighting associated with the proposed commercial uses would include interior lights, architectural and/or thematic accent lighting to highlight building elements or details, accent lighting for landscaping where appropriate, exterior way-finding and security lighting, signage lighting, vehicle headlights, and wall- or pole-mounted light fixtures. All lighting of outdoor areas would be directed onto driveways, walkways, landscaping, building facades, and parking areas and away from adjacent properties and public rights of way to avoid any light trespassing from lighting fixtures included in the project. Furthermore, the new street trees that would line the perimeter of the site would also minimize light spillover. For these reasons, the new lighting established on the site would not result in a substantial increase in light that could adversely affect nighttime views in the area.

Glare from building windows would increase under the proposed project. However, non-reflective materials and low reflective glass would be used in the construction of the proposed project, and thus the project would not result in a substantial new source of glare that would adversely affect daytime views in the area.

Finally, the project is required to incorporate lighting design specifications that prohibit intense stationary exterior lighting or the creation of direct glare from light sources as outlined in the Section 93.0117 of the Los Angeles Municipal Code (LAMC).

As such, the proposed project would not result in a substantial new source of light and glare that would adversely affect daytime or nighttime views in the area and impacts would be less than significant and no further analysis is required.

2. AGRICULTURE AND FOREST RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
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?	☐	☐	☐	☒

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the project site is not included in the Important Farmland category.[3] The project site is located within an urbanized area of the City of Los Angeles and is surrounded by light industrial and manufacturing uses. Implementation of the proposed project would not convert farmland to non-agricultural use, and no impacts would occur.

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

No Impact. The proposed project is located in the West Adams-Baldwin Hills-Leimert Community Plan Area and zoned M1-1VL (Limited Industrial). The General Plan land use designation for the project site is Limited Industrial. The project site is not zoned for agricultural uses nor do agricultural uses occur on the project site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the project site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the proposed project would not conflict with existing agricultural zoning or a Williamson Act Contract, and no impacts would occur.

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

No Impact. As discussed in **Section 2.b**, the project site is zoned M1-1VL and is located in an urban area. The project site and the surrounding area are zoned for industrial and manufacturing uses. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the proposed project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur.

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

No Impact. See response to **Section 2.c**, above.

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.[4] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including

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3 *State of California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program, Los Angeles County 2012 Important Farmland Map. Accessed July 2018 online at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf.*

4 *California Public Resources Code Section 12220[g]*

Christmas trees.[5] There are some trees located on the project site and located along the street adjacent to the project site, but these are all common ornamental species, with no timber value.[6] There is no forest land or timberland on-site or in the project vicinity and project development would not cause a loss of forest land or timberland. No impacts would occur, and no further analysis is required.

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

No Impact. See responses to **Sections 2.a - d**, above. The site is located in an urbanized area, and there are no agricultural uses or related uses on the project site. The proposed project would not result in the conversion of farmland to other uses, and no impacts would occur.

5 *California Public Resources Code Section 4526*

6 *There are 38 eucalyptus tree species and 1 ficus tree species on the project site according to a tree survey conducted by Gaudet Design Group, June, 2018.*

3. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality 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 project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

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

Would the project:

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

Project Consistency with Air Quality Plans

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

The proposed project is a commercial development consisting of office space, light manufacturing, and a retail coffee shop. As an infill development, the project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the project would utilize the existing facilities. However, the project would introduce new jobs to the region. According to SCAG's Profile of the City of Los Angeles[7], the City's total jobs in 2015 was 1,783,626. The proposed project is estimated to generate approximately 200+ new jobs. According to SCAG, the City's total jobs are expected to grow to 2,169,100 in 2040.[8] The increase in jobs resulting from the proposed project would not be considered substantial in consideration of anticipated growth for the City, representing approximately 0.1 percent of the anticipated growth. Therefore, the proposed project would not directly induce substantial growth in the project area, and impacts would be less than significant.

City of Los Angeles General Plan Air Quality Element. The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in **Table AQ-1**, **Project Consistency with City of Los Angeles General Plan - Air Quality Element** the proposed project is consistent with the applicable policies in the General Plan. As such, the proposed project's impact on the City's General Plan would be considered less than significant. No further analysis is necessary.

7 *Southern California Association of Governments' (SCAG) Profile of the City of Los Angeles, website: https://www.scag.ca.gov/Documents/LosAngeles.pdf, accessed March 12, 2018.*

8 *SCAG, 2040 RTP/SCS, Demographics & Growth Forecast Appendix. December 2015.*

Table AQ-1
Project Consistency with City of Los Angeles General Plan - Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The proposed project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The proposed project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The proposed project includes provisions for carpool/vanpool vehicle reserved parking as well as bicycle parking.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** The proposed project will develop a Transportation Demand Management (TDM) plan as part of mitigating potential traffic impacts. This program establishes a Transportation Management Office (TMO) that is tasked with providing employees alternative commuting options to reduce vehicle trips.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** The proposed project includes both vanpool and bicycle parking, and electric vehicle charging.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The proposed project includes both vanpool, bicycle parking, and electric vehicle charging.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The proposed project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The proposed project would minimize traffic impacts below significance thresholds.

Table AQ-1
Project Consistency with City of Los Angeles General Plan - Air Quality Element

Strategy	Project Consistency
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The proposed project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The proposed project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The proposed project would be infill development that would provide residents with provide the local area with both retail café as well as increased employment.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The proposed project would be located in an urban area with infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority, LADOT, and Culver City Bus.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The proposed project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The proposed project would be located in an urban area with infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority, LADOT, and Culver City Bus.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.

Table AQ-1
Project Consistency with City of Los Angeles General Plan - Air Quality Element

Strategy	Project Consistency
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.

Source: Impact Sciences, July 2018.

As demonstrated by the analysis, the air quality impacts of the proposed project are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. The project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be considered less than significant. Similarly, the proposed project is consistent with the City's General Plan Air Quality Element's policies and would not conflict with its goals and objectives. Project impacts would be less than significant. No further analysis is necessary.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant with Mitigation Incorporated. 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. As previously discussed, the proposed project is located within the SCAQMD jurisdiction.

Construction Phase Air Quality Impacts on Regional Air Quality

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2016.3.2 model (included as Appendix C of this Initial Study) using assumptions from the project applicant. The project site features four main components: a coffee shop with drive through, warehouse, manufacturing, and corporate offices. Project construction is anticipated to begin in the winter of 2019 and conclude in the summer of 2021. **Table AQ-2, Proposed Construction Schedule** summarizes the proposed construction schedule that was modeled for air quality impacts.

Table AQ-2
Proposed Construction Schedule

Phase	Duration[1]
Grading	4 Months (1/1/2019 Start)
Construction	26 Months (5/1/2019 Start)
Paving	1 Month (6/1/2021 Start)
Architectural Coating	1 Month (6/1/2021 Start)

[1] - All durations approximate.
Source: Impact Sciences, 2018

As shown in **Table AQ-3**, **Estimated Daily Construction Emissions - Unmitigated** the construction of the proposed project will produce regional VOC emissions that exceed the SCAQMD's regional thresholds. As a result, unmitigated construction of the proposed project would contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Regulatory Compliance Measure **RCM-AQ-1** and mitigation measures **MM-AQ-1** and **MM-AQ-2** would reduce these impacts to the furthest extent technically feasible. This impact is considered **less than significant with mitigation incorporated**.

Table AQ-3
Maximum Estimated Daily Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
2019	5	61	36	<1	9	5
2020	4	38	34	<1	5	2
2021	90	35	33	<1	5	2
Maximum Regional Total	90	61	36	<1	9	5
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	***Yes***	***No***	***No***	***No***	***No***	***No***
Maximum Localized Total	90	31	21	<1	7	4
Localized Significance Threshold	--	143	1,213	--	19	5
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

Source: Impact Sciences, 2018 based on CalEEMod 2016.3.2 model runs, included in Air Quality Appendix C.
LST analyses based on 2 acre site with 50 meter distances to receptors in Northwest Coastal LA County (SRA 2) source receptor area.

Table AQ-4, Estimated Daily Construction Emissions – Mitigated shows construction emissions after **RCM-AQ-1 and MM-AQ-1**are applied. After implementation of **RCM-AQ-1** and **MM-AQ-1**, the construction of the proposed project will produce regional VOC emissions that will not exceed the SCAQMD's regional thresholds.

Table AQ-4
Maximum Estimated Daily Construction Emissions – Mitigated

Construction Phase	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
2019	5	61	36	<1	9	5
2020	4	38	34	<1	5	2
2021	46	35	33	<1	5	2
Maximum Regional Total	46	61	36	<1	9	5
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
Maximum Localized Total	44	31	21	<1	7	4
Localized Significance Threshold	--	143	1,213	--	19	5
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

Source: Impact Sciences, 2018 based on CalEEMod 2016.3.2 model runs, included in Air Quality Appendix C.
LST analyses based on 2 acre site with 50 meter distances to receptors in Northwest Coastal LA County (SRA 2) source receptor area.

Construction Phase Air Quality Impacts on Local Air Quality

As shown in **Table AQ-4**, the proposed project would produce emissions that do not exceed the SCAQMD's recommended localized thresholds for NO_2, CO, PM10, and PM2.5 during the construction phase. As a result, construction impacts on localized air quality are considered **less than significant.**

It should be noted that the SCAQMD would regulate fugitive dust emissions of PM10 and PM2.5 through SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. These are described below in **RCM-AQ-1**.

Regulatory Compliance Measure

RCM-AQ-1 A Construction Management Plan (CMP) is required to control fugitive dust and to comply with SCAQMD minimum requirements and Rule 403 to control dust. The CMP shall specify measures to be implemented, which may include the following:

- Limit soil disturbance to the amounts analyzed in this air quality analysis.

- The Applicant shall limit on-site construction vehicle speeds to no more than 15 miles per hour to reduce dust.
- Soil disturbing activities shall be terminated when wind gusts exceed 25 miles per hour.
- Areas that are to undergo earthmoving shall be watered to the depth of excavation prior to soil disturbance and daily watering shall be ongoing at least three times per day or as otherwise necessary to prevent fugitive dust.
- Soil stabilizers shall be applied to inactive areas according to manufacturer specifications (previously graded areas inactive for 10 days or more).
- All stockpiles shall be covered with tarps before rain or wind events.
- Vegetative cover landscaping shall be established on all disturbed areas as soon as possible to prevent long-term wind or water erosion.
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt track-out onto truck exit routes
- All trucks hauling soil or other loose earthen materials shall be covered or shall maintain at least 12 inches of freeboard.
- The Applicant shall designate an on-site construction relations officer to act as community liaison to address dust concerns of the neighborhood residents.

Mitigation Measure

MM-AQ-1 The construction contractor shall use low-VOC architectural coatings of 50 grams per liter or less on both interior and exterior surfaces.

Residual Impacts

Residual impacts would be less than significant.

Operation Phase Air Quality Impacts

The project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the project site. Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOX, CO, PM10 and PM2.5 emissions (**Table AQ-5, Estimated Daily Operations Emissions - Unmitigated**). As a result, the project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the proposed project would emit minimal emissions of NO2, CO, PM10, and PM2.5 from area and energy sources on-site. As shown in **Table AQ-5**, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The project's operational impacts on localized air quality are considered less than significant.

Table AQ-5
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
Area Sources	5	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	3	13	36	<1	9	3
Total Regional Total	**8**	**14**	**37**	**<1**	**9**	**3**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
Localized Total	5	<1	<1	<1	<1	<1
Localized Significance Threshold	--	143	1,213	--	5	2
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

_____

Source: Impact Sciences, 2018 based on CalEEMod 2016.3.2 model runs, included in Air Quality Appendix C.

LST analyses based on 2 acre site with 50 meter distances to receptors in Northwest Coastal LA County (SRA 2) source receptor area.

The long-term operation of the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality. Project impacts would be less than significant and no further analysis is required.

c) 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.

Construction Phase Air Quality Impacts

Construction of the proposed project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants.

For regional ozone precursors, the project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. As such, the project's impact on cumulative ozone precursor emissions would be considered less than significant.

Similarly, regional emissions of PM10 and PM2.5 would not exceed mass thresholds established by the SCAQMD; therefore, construction emissions impacts would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. If any other proposed projects were to undertake construction concurrently with the proposed project, localized CO, PM2.5, PM10, and NO_2 concentrations would not exceed ambient air quality standards at nearby receptors. The application of localized significance thresholds (LSTs)[9] to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM2.5, PM10, and NO_2. Any projects that would exceed LSTs would perform dispersion modeling to confirm whether health-based air quality standards would be violated and mitigate any significant localized emissions accordingly. Receptors that are located further away would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LSTs recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM10 that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

Construction of the project would not produce cumulative considerable emissions of localized nonattainment pollutants PM10 and PM2.5, as the anticipated emissions would not exceed LSTs set by the SCAQMD. This is considered a less than significant impact.

9 *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 represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project, size, distance to the sensitive receptor, etc. Lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.*

Construction of the proposed project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant and no further analysis is required.

Operation Phase Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table AQ-5**, the project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The project is a corporate office and manufacturing development that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM10 and PM2.5 would be minimal, and would not contribute substantially to any surrounding sources of localized nonattainment pollutants.

Long-term operation of the project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant. Project impacts would be less than significant and no further analysis is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur if the construction or operation of a project exceeds an Ambient Air Quality Standard at a sensitive receptor location. SCAQMD protocol utilizes localized CO concentrations from motor vehicles and localized concentrations of NOx, CO, PM10, and PM2.5 from construction and operation to determine localized pollutant concentration potential. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[10]

Construction Phase Air Quality Impacts on Sensitive Receptors

Construction of the proposed project could produce air emissions that impact several existing sensitive receptors near the project site, including:

- Baldwin Hills Scenic Overlook located approximately 300 feet to the west of the project site;
- Single-family residences located approximately 600 feet to the southeast of the project site; and
- Single- and multi-family residences located approximately 950 feet to the east of the project site.

10 *SCAQMD CEQA Air Quality Handbook, 1993, page 5-1.*

As shown in **Table AQ-4**, these nearby receptors would not be exposed to substantial concentrations of localized pollutants PM10 and PM2.5 from construction of the proposed project. Specifically, construction activities would not exceed SCAQMD LST thresholds for PM10 and PM2.5 and represent a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Construction of the proposed project would not have any significant impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant and no further analysis is required.

Operation Phase Air Quality Impacts on Sensitive Receptors

The proposed project would generate long-term emissions from mobile sources that would generate relatively small pollutant concentrations of CO, NO_2, PM2.5, or PM10 at sensitive receptors and would be considered less than significant.

Long-term operations of the project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[11] Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. According to the traffic study for the proposed project, incorporation of the Transportation Demand Management and Monitoring Program, defined in the report, would reduce level of service impacts to less than significant and would not significantly worsen traffic flow.[12] In addition, the project would not significantly increase the percentage of vehicles operating in cold start mode.

Finally, the project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by ARB based on chronic exposure to these emissions.[13] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the project does not include

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

12 *Overland Traffic Consultants, 6024 Jefferson Mixed-Use Traffic Impact Study. July, 2018.*

13 *California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust, website: www. http://oehha.ca.gov/public_info/facts/dieselfacts.html, accessed July 20, 2017.*

typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[14] The project would not generate a substantial number of truck trips. The majority of truck (diesel) trips would be generated by warehousing activities and manufacturing (though the manufacturing use would generate less than warehousing). According to the traffic study prepared for the proposed project, the majority of trips are a result of office and retail operations (only 299 trips, or 17% of all project trips, result from both warehousing and manufacturing activities, refer to **Section 16, Transportation and Traffic**). The majority of trips generated by warehouse and manufacturing land uses would be light duty passenger vehicles (approximately 80% of trips are from passenger vehicles). Additionally, all regional and localized emissions are far below SCAQMD significance thresholds, and do not represent a significant amount of regional or localized emissions of any criteria pollutant. Lastly, the nearest residence is located approximately 600 feet to the southeast of the project site, and over 1,000 feet from the proposed warehouse land use. Although very large warehouse distribution centers emitting significant levels of diesel emissions may result in an impact at receptors 600-1,000 feet away, a project that is significantly below SCAQMD regional and local thresholds, and has a relatively minimal amount of diesel truck traffic, is not anticipated to result in an impact at a distance of 600-1,000 feet. Based on the distance to the nearest sensitive receptors, and the limited activity of TAC sources, the project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, project impacts related to TACs would be less than significant.

Long-term operation of the proposed project would not have any significant impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant and no further analysis is required.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the project site. Development of the proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the construction-related odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[15] A less than significant impact relative to an odor nuisance would occur during construction associated with the proposed project.

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

15 *SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

According to the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[16] The proposed project would include coffee manufacturing and warehousing which could emit odors during operation. As discussed above, the project would be required to comply with SCAQMD Rule 402. In addition to this, the nearest residential receptors are located approximately 600 feet from the project site, and are unlikely to experience odors emanating from the project site.

Additional odors associated with project operation would be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the on-site restaurant operations. Furthermore, all trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by the Los Angeles County Health Department regulations, and be emptied on a regular basis. Therefore, the implementations of the proposed project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required.

16 *South Coast Air Quality Management District, CEQA Air Quality Handbook; http://www.aqmd.gov/ceqa/hdbk.html, December 11, 2015.*

4. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
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 a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Would the project:

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

No Impact. The project site is currently undeveloped and zoned for light industrial use; the project site is, located in an urban portion of the City. Although the project site is

located near the Ballona Creek channel, the channel is located across from the busy four-lane W Jefferson Boulevard, and the edge of the Ballona Creek channel is marked by chain link fencing. Ballona Creek is a concrete channelized waterway and generally does not provide high quality habitat for wildlife or vegetation. Therefore no special status/sensitive species are expected to occur on the project site from proximity to the Ballona Creek Channel. The project site is not located near any Open Space Zones within the City of Los Angeles. The project site is also not located near any County of Los Angeles Significant Ecological Areas (SEAs).[17]

The project site is not located within any US Fish and Wildlife Service (USFWS) listed species critical habitat. USFWS records show that there is the potential for two listed species and one listed plant to occur in the vicinity of the project site: the coastal California gnatcatcher, the western snowy plover, and gambel's watercress.[18] The project site is located near the Baldwin Hills Scenic Overlook, located in the City of Culver City. The scrublands habitat found within the Baldwin Hills area is vital to several rare and threatened species including the California Gnatcatcher and the western snowy plover. Gambel's watercress requires wetland habitat, and is not present in the vicinity of the project site. No federally- or state-listed species have been detected within the project site boundaries.

Because of the nature of the previously disturbed project site and the project site's developed surroundings, development of the project site would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.

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

No Impact. The site is located in an urban area. No riparian habitat or other sensitive natural community exists within the project area or in the surrounding area.[19] There is limited vegetation on the project site, consisting primarily of eucalyptus tree species and two ficus tree species, not protected as defined under Los Angeles Municipal Ordinance 177,404 (also known as the 'Protected Tree Ordinance), and would be removed for project construction. Implementation of the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California

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17 *City of Los Angeles. City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources. 2001. Accessed July 2018 online at: https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

18 *US Fish and Wildlife Service. Information for Planning and Consultation (IPaC). 2018. Accessed July 2018 online at: https://ecos.fws.gov/ipac/.*

19 *City of Los Angeles. City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources. 2001. Accessed July 2018 online at: https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

Department of Fish and Wildlife or United States Fish and Wildlife Service. Therefore, no impacts would occur.

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?

No Impact. The site is located in an urban area. There are no wetlands or bodies of water within the project area or in the surrounding area.[20] Buildout of the proposed project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur.

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

Less Than Significant Impact. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the project site or in the surrounding area. However, a number of mature trees are present within the project site. Although the trees are common, non-native, and not protected, they may provide suitable habitat, including nesting habitat, for migratory birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities.

The project site location, along a busy roadway and among limited industrial and manufacturing uses, has a limited ability to support both native resident and migratory species. These disturbances decrease the project site's value as suitable breeding and foraging habitat, and also as a migration corridor or overland dispersal habitat because the property is movement-constrained. The more factors that constrain species habitats and dispersal / movement corridors, the less likely individuals are to occur, or continue to occur within a specific locale. Furthermore, the Proposed Project site does not connect large blocks of natural open space that are considered essential for long-term plant and wildlife viability in Los Angeles County.

[20] *US Fish and Wildlife Service. National Wetlands Inventory. 2018. Accessed July 2018 online at: https://www.fws.gov/wetlands/data/mapper.html.*

The proposed project would comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found.

The USFWS administers permits to take migratory birds in accordance with the MBTA. These are described below in Regulatory Compliance Measure **RCM-BIO-1**. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements as outlined in RCM-BIO-1, impacts would be less than significant and no further analysis is required.

RCM-BIO-1 To avoid impacting nesting birds, special status birds and/or raptors protected under the MBTA, one of the following must be implemented:

- Conduct vegetation removal and other demolition or ground disturbance activities associated with construction during September through January, when birds are not nesting. If feasible, initiate tree removal, vegetation clearing and grading activities prior to the breeding season (generally February 1st through August 31st) and keep disturbance activities constant throughout the spring to prevent birds from establishing nests in surrounding habitat in order to avoid abandonment of eggs or young if nesting establishes prior to construction activities; or

- Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction survey no more than 30 days prior to initiation of tree removal or grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the Project Site).

- If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFW and implemented to prevent abandonment of the active nest. At a minimum, tree removal and grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 50 feet for songbird nests, 100 feet for special status songbird nests, and 200 to 500 feet for raptor nests, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area.

- A survey report by the qualified biologist verifying that the young have fledged shall be maintained in the project file, and submitted to the City of Los Angeles upon request. The qualified biologist shall serve as a construction monitor during

those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

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

Less Than Significant Impact. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), defines protected trees as:

> Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree*:*
>
> *Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa),*
>
> *Southern California Black Walnut (Juglans californica* var*. californica),*
>
> *Western Sycamore (Platanus racemosa), and*
>
> *California Bay (Umbellularia californica).*

As previously discussed, there are several trees on the project site; none of the existing trees are in the public right-of-way. All of the trees are common, ornamental/non-native species and thus are not protected as defined under Los Angeles Municipal Ordinance 177,404. Project construction proposes to remove all of these existing trees (see **Figure II-10, Landscape Plan**).

It is the City's policy to require the replacement of existing mature (defined as having a DBH of 8-inches or more) non-protected trees removed at development sites at a 1:1 ratio with a minimum 24-inch box size tree. Further, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's (UFD) policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan would be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan would demonstrate the minimum replacement ratio of 1:1 for the existing mature trees and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978.

Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the UFD.

Following the implementation of Regulatory Compliance Measure **RCM-BIO-2**, which outlines the City's standard policies and procedures, impacts would be less than significant.

RCM-BIO-2 The Project Applicant shall replace all mature trees at the project site which are removed for the redevelopment at a 1:1 ratio. The specific implementation programs are as follows:

i. Prior to the issuance of a grading permit, a plot plan prepared by a tree expert, as defined by the City of Los Angeles Ordinance Nos. 170,978 and 177,404, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services.

ii. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Additional measures such as replacement of mature trees removed by the project, on a 1:1 basis, with minimum of 24-inch box trees on the site, shall be required for the unavoidable loss of desirable trees on the site, to the satisfaction of the Urban Forestry Division of the Bureau of Street Services and the Advisory Agency. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

iii. The genus or genera of the tree(s) shall provide a minimum crown of 30'-50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No. 170,978), Guidelines K – Vehicular Use Areas.

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

No Impact. The site is located in a developed urbanized area and does not provide habitat for sensitive biological resources. There are no Sensitive Ecological Areas (SEAs) within the vicinity of the project site.[21] Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the proposed project. Therefore, implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, and no impacts would occur.

[21] *City of Los Angeles. City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources. 2001. Accessed July 2018 online at: https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

5. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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 dedicated cemeteries?	☐	☐	☒	☐

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that 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.

The project site is unimproved. The project site does not contain any site, building, or structure determined to be eligible by the State Historical Resources Commission, listed in the California Register of Historical Resources, or identified as a Los Angeles Historic-Cultural Monument (HCM).[22] The project site is in the West Adams-Baldwin Hills-Leimert Community Plan Area. According to the Community Area Plan the area is primarily designated for limited industrial and manufacturing uses. The project site is not part of an historic district and there would be no impacts to historical resources.

[22] *City of Los Angeles. City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS). Accessed July 2018 online at: http://zimas.lacity.org/.*

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

Less Than Significant Impact. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

The project site is located in an urbanized area of the City and has been previously disturbed and developed. However, construction of the proposed project would include a two-level subterranean parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils.

All development would be subject to the numerous laws and regulations, including, but not limited to, Section 21083.2 of the Public Resources Code (PRC) and CEQA Guidelines Section 15064.5, that require state, and local agencies to consider the effects of a project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur.

In the event that archaeological resources are uncovered on the project site during grading or other construction activities, the work would be stopped within a 100-foot radius, the City of Los Angeles Planning Department would be notified, and a qualified archaeologist approved by the City would evaluate the find. Construction activity may continue unimpeded on other portions of the project site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue. Compliance with these protocols would reduce impacts to a less than significant level.

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

Less Than Significant Impact with Mitigation Incorporated. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

As discussed above in **Section 5(b),** the project site is in a highly urbanized area of the City that has been previously disturbed and developed. However, build out of the proposed project could, specifically the construction of the subterranean parking garage, involve grading and excavation to greater depths than previously undertaken. Project-

related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the event of an unexpected disturbance of such resources, significant impacts to paleontological resources could occur. However, compliance with **Mitigation Measure MM-CUL-1** would reduce impacts to a less than significant level. No further analysis is necessary.

Mitigation Measure:

MM-CUL-1 If any paleontological materials are encountered during the course of Project development, work in the area shall be halted. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if appropriate, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

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

Less Than Significant Impact. There are no known human remains on or near the project site. Additionally, the project site is located in a highly urbanized portion of the City. Because the project area has already been previously disturbed and developed, it has been subject to construction and ground-disturbing activities. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remain are discovered, work on the portion of the project site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall

consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these requirements would reduce impacts to a less than significant level.

6. GEOLOGY AND SOILS

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD) ruled that CEQA generally does not require a lead agency to consider the impacts of the environment on the future residents or users of the project. Specifically, the decision held that an impact of the existing environment on the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD ruling, the project would have a significant impact related to exposure of future users and/or project residents and structures to hazards related to geology and soils only if the project would exacerbate existing conditions.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults.

As indicated by the Department of Conservation, the project site is not within a state-designated Earthquake Fault Zone.[23] The project site is not within a City designated Preliminary Fault Rupture Study Area.[24] The fault closest to the project site is the Newport-Inglewood Fault, a north-south right-lateral strike-slip fault that traverses from the City of Culver City southeast through the City of Newport Beach into the Pacific Ocean. The fault is known to be active, and last ruptured in historic time in the 1933 Long Beach earthquake. The project site is

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23 City of Los Angeles. Department of Conservation, Los Angeles Quadrangle. Accessed July 2018 online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/.

24 City of Los Angeles. City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS). Accessed July 2018 online at: http://zimas.lacity.org/.

located in the vicinity of the fault, approximately 300 feet to the southwest of the approximated fault line and Earthquake Fault Zone.

As part of a limited study across the project site, Cone Penetration Tests (CPTs) were advanced across the project site to test the presence of vertical offset; the tests revealed consistent depth to top of bedrock. In addition, groundwater levels were generally consistent in depth across the project site. These test results indicate that there is no evidence that there is a fault across the project site.[25] The potential for the proposed project to exacerbate the existing conditions, in whole or in part, to cause a future surface rupture onsite is expected to be very low, and there would be a less than significant impact related to ground rupture.

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

Less Than Significant Impact. The project site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes on the Santa Monica, Newport-Inglewood, Hollywood, Malibu Coast, or Anacapa-Dume Faults.

However, this impact would be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Building Code (LABC) seismic standards; as well as the recommendations of the Geotechnical Report[26] provided in Appendix D of this Initial Study, as required by the LADBS.

Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels.

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

Less Than Significant Impact. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest

25 *Applied Earth Sciences Inc. Preliminary Report of Limited Geotechnical, Geologic, and Environmental Investigation. January, 2016, included as Appendix D of this Initial Study.*

26 *Ibid.*

where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

According to the "Seismic Hazard Evaluation of the Beverly Hills 7.5-Minute Quadrangle, Los Angeles County, California" dated 1998 by the Department of Conservation - Division of Mines and Geology, historically, the highest groundwater depth in the vicinity of the project site is near a depth of approximately 10 to 20 feet.[27] As discussed in the Geotechnical Report, the groundwater level across the study area is generally consistent.

As discussed in the Geotechnical Report, the project site is partially located within a State of California Liquefaction Seismic Hazard Zone.[28] The northern portion of the site fronting W Jefferson Boulevard is within an area where there is the potential for permanent ground displacements. A liquefaction analysis was prepared for the site, and is detailed in the Geotechnical Report. The result of the liquefaction analysis indicate that soil liquefaction may be significant on the project site as a result of higher modeled settlement depths using a higher level peak ground acceleration and predominant earthquake magnitude of 6.81. However, as noted in the Geotechnical Report's recommendations for building foundations, use of "mat" foundations will alleviate the potential adverse effects of any liquefaction that could occur. This foundation type is a thick slab system supported through a deep foundation with friction piles.

The proposed project site exhibits characteristics that indicate a potential liquefaction risk; however, with appropriate foundation and construction methods as detailed in the Geotechnical Report, the potential liquefaction impacts from the proposed project would be reduced, and the resulting potential impact would be less than significant.

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

Less Than Significant Impact. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The project site is generally sloped north-south, rising in elevation toward the Baldwin Hills to the south of the project site.

As discussed in the Geotechnical Report, the topography to the south of the project site is an area susceptible to landslides. Geomorphic features visible suggest the presence of potential landslides on the slop of the hills to the south and southwest of the project site; however, the hillside area to the immediate

27 *Applied Earth Sciences Inc. Preliminary Report of Limited Geotechnical, Geologic, and Environmental Investigation. January, 2016.*

28 *Ibid.*

south of the site does not show signs of recent sliding. Past reports by the City of Los Angeles Bureau of Engineering – Geotechnical Engineering Division (LABOE-GED) suggest that the hillside in this area is at risk of failure.

As a result of the potential for landslide to occur in the hillside to the south of the project site in the Baldwin Hills area, the proposed project would include a combination of impact and diversion walls along the southern property boundary to protect future development from impact from mobilized slide debris from the slopes. In addition, the new Building B would be set back from the rear of the property to protect the structure and occupants from impact related to slope instability.

Although the site is not located within a City-designated landslide area, and is not subject to the City's Hillside Ordinance, the project site is located adjacent to properties that may be at risk for landslide.[29] Without protective measures, landslides in this area may have an impact on the proposed project; however, with the implementation of Project Design Feature PDF-GEO-1, which would require the construction of impact and diversion walls, the proposed project would not be impacted by landslides, and there would be a less than significant impact.

Project Design Feature

PDF-GEO-1: Prior to the issuance of a building permit the Project Applicant will complete a landslide mitigation plan, including detailed mapping, exploration, and evaluation of the thickness, extent, and composition of potential landslide debris, along with detailed calculations, specifications and plans for diversion walls, an impact wall, and a debris storage basin in the southeast portion of the property, and a diversion channel for debris to the street along the western property boundary, as shown on *Drawing No. 2 – Preliminary Geologic Map and Site Plan* of the Geotechnical Report, and any other plans and specifications as required by the LABOE-GED to ensure that potential impacts would be reduced to less than significant levels.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

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29 *City of Los Angeles. City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS). Accessed July 2018 online at: http://zimas.lacity.org/.*

The project site is located in an urbanized area of the City and has a minimal change in elevation. The proposed project is a mixed-use development with a subterranean parking garage, with landscaped and hardscaped areas, and would contain small amounts of soil as planting beds, which would be planted and routinely maintained to prevent any loss of soil. Following the completion of construction of the proposed project, the potential for soil erosion, or the loss of topsoil is expected to be extremely low.

Construction of the proposed project would involve soil disturbance activities including excavation and grading that would leave soil on the project site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the proposed project will be subject to local and state codes and requirements for erosion control and grading during construction, including, but not limited to, Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Further, the proposed project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010 (and as updated in July 2012), regulates construction activities to minimize water pollution, including sediment. The proposed project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed project would not occur and soil erosion impacts would be less than significant.

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

Less Than Significant Impact. As stated in **Section 6.a.iii - iv**, the proposed project site is not in a landslide zone, but the underlying soils may be potentially subject to liquefaction. To control for the potential adverse impacts of liquefaction, the project would comply with all the recommendations of the Geotechnical Report. In addition, the

project would comply with the conditions contained in the Soils Report Approval Letter once it is issued, as required by the LADBS. The proposed project will be designed and constructed in conformance with the CBC, as well as LABC requirements and other laws designed to protect site occupants from risks related to unstable soil. Adoption of the design recommendations contained in the Geotechnical Report, and compliance with the existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction, or collapse would reduce potential impacts to less than significant levels.

d) Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Based on soil classifications and laboratory test results performed during the preparation of the Geotechnical Report, on-site soils were found to have low expansion indices. Further, as described above, the proposed project would be designed and constructed in conformance with the LABC, and would be subject to the requirements of the CBC. Compliance with existing laws, the recommendations of the Geotechnical Report, and the conditions contained in the Soils Report Approval Letter, as required by the LADBS regarding expansive soils, would reduce potential impacts to less than significant levels.

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

No Impact. The project site is currently served by the City of Los Angeles wastewater (sewer) system. The proposed project would require connection to existing sewers mainlines and service lines, which are currently available in the surrounding roadways. The proposed project would not require the use of septic systems. Therefore, no impact would occur.

7. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Would the project:

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

Less than Significant Impact. Construction and operation (i.e., use of the new building by occupants and mobile emissions associated with such use) of the proposed project would generate greenhouse gas emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[30] Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[31] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

Methodology

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

30 *CEQA Guidelines Section 15064.7.*

31 *CEQA Guidelines Section 15064.7(c).*

GHG emissions were quantified from construction and operation of the project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[32]

Significance Criteria

The SCAQMD is currently developing significance thresholds for greenhouse gas (GHG) emissions, but has published draft thresholds using a tiered approach. The draft approach as most recently updated in September 2010 is as follows:[33]

- Tier 1: Is the project exempt from further analysis under existing statutory or categorical exemptions? If yes, there is a presumption of less than significant impacts with respect to climate change.

- Tier 2: Is the project's GHG emissions within the GHG budgets in an approved regional plan? (The plan must be consistent with *State CEQA Guidelines* §§15064(h)(3), 15125(d), or 15152(s).) If yes, there is a presumption of less than significant impacts with respect to climate change.

- Tier 3: Is the project's incremental increase in GHG emissions below or mitigated to less than the significance screening level (10,000 $MTCO_2e$ per year for industrial projects)? If yes, there is a presumption of less than significant impacts with respect to climate change.

- Tier 4: Does the project meet one of the following performance standards? If yes, there is a presumption of less than significant impacts with respect to climate change.

    - Option #1: Achieve some percentage reduction in GHG emissions from a base case scenario, including land use sector reductions from AB 32 (e.g., 29 percent reduction as recommended by the San Joaquin Valley Air Pollution Control District).

    - Option #2: For individual projects, achieve a project-level efficiency target of 4.6 $MTCO_2e$ per service population by 2020 or a target of 3.0 $MTCO_2e$ per service population by 2035. For plans, achieve a plan-level efficiency target of 6.6 $MTCO_2e$ per service population by 2020 or a target of 4.1 $MTCO_2e$ per service population by 2035.

32 *See www.caleemod.com.*

33 *South Coast Air Quality Management District, "Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting #6," http://www.aqmd.gov/ceqa/handbook/GHG/2008/oct22mtg/oct22.html. 2008.*

- Tier 5: Does the project obtain offsets alone or in combination with the above to achieve the target significance screening level (offsets provided for 30-year project life, unless project life limited by permit, lease, or other legally binding conditions)? If yes, there is a presumption of less than significant impacts with respect to climate change. Otherwise, the project is significant.

As of July 2011, the SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the Governing Board for consideration. The SCAQMD has adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable to boilers and process heaters, forestry, and manure management projects.

The Tier 3 thresholds are the most applicable to this project. Tier 3 requires that a project's incremental increase in GHG emissions should be below or mitigated to less than the significance screening level. Because the project would be zoned as M1-1 (limited industrial) land use, and the project includes a significant amount of manufacturing space, the industrial threshold of 10,000 MTCO2e is deemed most applicable to the proposed project. Proposed projects that do not exceed the thresholds would not be considered to have a significant impact on the attainment of air quality goals and would, therefore, be considered to be consistent with the current air quality plan.

The SCAQMD draft thresholds do not provide separate significance thresholds for GHG emissions from construction activities, but recommend including them with operational emissions as amortized emissions over a 30-year project life. Therefore, the amortized construction GHG emissions are included in the project's overall operational emissions and compared to the threshold of 10,000 $MTCO_2e$ per year.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[34]

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

Thus, the project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan
- SCAG's Sustainable Communities Strategy; and

34 *14 CCR § 15064(h)(3).*

- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

Construction and Operation Impacts on Climate Change

Construction emissions were estimated using CalEEMod according to the same methodology as described above in **Section 3, Air Quality.** The SCAQMD recommends that construction GHG emissions be amortized over a 30-year project lifetime and included in the long-term operational GHG emissions. **Table GHG-1, Estimated Operational Greenhouse Gas Emissions,** shows a summary of total estimated GHG emissions from construction and operation of the proposed project and compares the total to the SCAQMD significance thresholds.

Table GHG-1
Estimated Annual CO_2e Greenhouse Gas Emissions
(Metric Tons per Year)

Scenario and Source	2020 Project Emissions
Area Sources	<1
Energy Sources	2,272
Mobile Sources	1,614
Waste Sources	56
Water Sources	336
Construction (Amortized)	89
Total Emissions	**4,367**
SCAQMD Threshold	**10,000**
Exceeds Threshold?	***No***

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

Source: Impact Sciences, 2017.

As discussed above, the proposed project would be zoned M1-1 (limited industrial), and includes a significant portion of manufacturing space as part of the project. Therefore, the SCAQMD industrial GHG threshold of significance is used to compare project emissions to. As shown in **Table GHG-1**, the proposed project's operational emissions would not exceed the threshold of 10,000 MTCO2e for industrial land use development projects. Consequently there are no significant impacts from GHG emissions attributable to the project. As a result of this and the analysis of net emissions, the project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. No further analysis is required.

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

Less Than Significant Impact. The proposed project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the State CEQA Guidelines

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

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

Many of the emission reduction strategies recommended by ARB would serve to reduce the project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in ARB's First Update to the AB 32 Scoping Plan.[35,36]

As such, the project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. **Table GHG-2**, **Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies** evaluates the proposed project's consistency with the AB 32 Scoping Plan to determine whether it will result in

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

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

adverse cumulative impacts to global climate change. The proposed project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

Energy Sector: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the project's emissions level.[37] Additionally, further additions to California's renewable resource portfolio would favorably influence the project's emissions level.[38]

Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the project's emissions level.[39]

Water Sector: The project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.[40]

Waste Management Sector: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the project's emissions level.[41]

Table GHG-2
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the proposed project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the proposed project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** The project is designed to meet CALGreen building standards by including measures designed to reduce energy consumption.

37 *CARB, First Update, pp. 37-39, 85, May 2014.*
38 *CARB, First Update, pp. 40-41, May 2014.*
39 *CARB, First Update, pp. 55-56, May 2014.*
40 *CARB, First Update, p. 65, May 2014.*
41 *CARB, First Update, p. 69, May 2014.*

Table GHG-2
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the proposed project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the proposed project. The project's infill location near several bus routes operated by both Culver City Bus and the Los Angeles County Metropolitan Transportation Authority.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** The proposed project includes 15 percent of the total roof area set aside for future solar panels.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The project is designed to meet the City's Green Building Ordinance and CAL Green building standards and will include measures designed to reduce energy consumption.

Table GHG-2
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable.** State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Consistent.** The project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The project would use water-efficient landscaping.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The proposed project does not include agricultural facilities.

Source: Impact Sciences, 2018.

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

Consistency with SCAG's 2016-2040 RTP/SCS

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

Table GHG-3, **Project Consistency with SCAG 2016-2040 RTP/SCS** demonstrates the project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the project would be

consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table GHG-3
Project Consistency with SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party	Consistency Analysis [a]
Land Use Strategies		
Reflect the changing population and demands, including combatting gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Not Applicable.** The project would not include residences that would add to the supply of housing in metropolitan Los Angeles County. However, the project would not hinder the region's pursuit of this policy.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The proposed project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG Local Jurisdictions	**Consistent.** The proposed project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the proposed project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The proposed project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the proposed project would not interfere with such policymaking.

Table GHG-3
Project Consistency with SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party	Consistency Analysis [a]
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Consistent.** The proposed project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the proposed project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the proposed project would not interfere with these programs.

Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016 and Impact Sciences, 2018.

Consistency with the City of Los Angeles ClimateLA Implementation Plan

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

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

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

With regard to transportation, the project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence.

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

With regard to water, the proposed project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the proposed project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as *CALGreen* and City Green Building Code that call for water-conserving fixtures and processes. These elements of the project would be consistent with goals set forth in the ClimateLA plan.

With regard to waste, the proposed project would be consistent with the ClimateLA goal of

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

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

Consistency with the City of Los Angeles Green Building Ordinance

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

The proposed project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The proposed project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.[42] As such, it would incorporate several design elements and programs (Project Design Features PDF-GHG 1 through PDF-GHG-5) that will reduce the carbon footprint of the development.

Project Design Features

PDF-GHG-1:

> **GHG Emissions Associated with Planning and Design.** The project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission

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

vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. These measures would include:

- Design features to maximize the capture and reuse of storm water during construction and operations.
- Inclusion of bicycle parking facilities on-site.
- Inclusion of electric conduits that provide the opportunity for electric vehicle charging facilities any time in the future.
- Implementation of best practices for managing storm water drainage and retention during construction (Green Building ordinance Section 99.04.106.2)
- Access to several public transportation lines. (Culver City Bus operates bus services on Jefferson Boulevard and Los Angeles County Metropolitan Transportation Authority operates several routes on La Cienega Boulevard and nearby arterials as well as a nearby Metro Expo Line station.)
- Located near residential neighborhoods. The project site's proximity to residential neighborhoods increases the likelihood that more travel to and from the development could be made by non-motorized modes that would reduce potential GHG emissions.

PDF-GHG-2:

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

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
    - All installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
    - All installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
    - All installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
    - All installed tank type water heaters will have an Energy Factor higher than .6.
    - All installed tankless water heaters will have an Energy Factor higher than .80.

  - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.

  - Building lighting in the kitchen and bathrooms will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

- All appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

PDF-GHG-3:

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

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

  - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or

  - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.

- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

    - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

    - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

PDF-GHG-4:

GHG Emissions Associated with Solid Waste Generation. The project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

PDF-GHG-5:

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

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer’s instructions around windows and doors, roof valley, and chimneys to roof intersections.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The proposed project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

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

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

Implementation of the project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The project is consistent with the approach outlined in ARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by ARB's *Climate Change Scoping Plan*, the project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

The project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

The project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions.

As discussed above, the project is consistent with the applicable GHG reduction plans and policies. Moreover, while the project is not directly subject to the Cap-and-Trade Program, that Program will indirectly reduce the project's GHG emissions by regulating "covered entities" that affect the project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

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

Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant. No further analysis is necessary.

8. HAZARDS AND HAZARDOUS MATERIALS

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD) ruled that CEQA generally does not require a lead agency to consider the impacts of the environment on the future residents or users of the project. Specifically, the decision held that an impact of the existing environment on the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD ruling, the project would have a significant impact related to exposure of future users and/or project residents to hazards only if the project would exacerbate existing conditions.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
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 people residing or working in the project 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, caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐

Would the project:

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

Less Than Significant Impact. Construction of the proposed project would involve the use of those hazardous materials that are typically necessary for construction of mixed-use development (i.e., paints, certain building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the proposed project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the proposed project would be required to implement standard BMPs set forth by the City and the Los Angeles Regional Water Quality Control Board (RWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the proposed project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The proposed project consists of the development of restaurant/retail space, light manufacturing (coffee roasting), warehouse space, and corporate office space. Operation of the proposed project's restaurant/retail, coffee roasting, outdoor plazas, and office space would require a variety of products generally used for cleaning and maintenance, some of which are potentially hazardous. Such products would only be considered hazardous if used or stored inappropriately. The types of potentially hazardous materials associated with operation of the proposed project include solvents, paints, or pesticides and herbicides for landscaping. However, these materials would be primarily used for cleaning and grounds maintenance purposes.

All potentially hazardous materials transported, stored, or used on site for daily upkeep are expected to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In addition, the proposed project would not involve the use or handling of acutely

hazardous materials, substances, or waste. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact with Mitigation. As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal, use, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. Environmental exploration was performed to investigate the potential for residual contaminants related to the petroleum operations on the project site; this information is contained in the Geotechnical Report (included as Appendix D of this Initial Study).

The property is a former Chevron Bulk Product Transfer Terminal, as documented in a recent report entitled Preliminary Report of Limited Geotechnical, Geologic, and Environmental Investigation.[43] The Report presents, in chronological order, the history of this 7.75-acre site from its operations as a movie studio (1928 to 1941), the bulk transfer terminal from 1949 until it was abandoned in late 1988. Materials handled at the facility were those products typical of refined product terminals including leaded and unleaded gasoline, diesel fuel, motor oil and used oil.

According to available historical sources, the project site was formerly a movie studio (1928-1941); import fill was added to the lower pad (1947); Chevron Bulk Product Transfer terminal (1949-1988); City of Los Angeles acquired the property and added fill to the lower pad (circa 1989); the lower pad was raised several times (1995-1997), construction and operation of an Air Treatment Facility (ATF) to treat the odors from the East Central Interceptor Sewer which is part of the North Central Outfall Sewer (NCOS) (2009-2014).

Multiple previous reports describe significant report performed at the project site. These include:

- Holguin, Fahan & associates, Inc. produced a Geotechnical Engineering Exploration for this property with owner Chevron U.S.A. in March 13, 1996. Chevron Pipeline company previously operated a refined gasoline pipeline from 1949 to 1988, along the east and north site property lines. In February 1988 Holguin, Fahan & Associates found absorbed phase hydrocarbons associated with compromised USTs. The bulk transfer facility stored 10 non gasoline USTs and 3 above ground storage tanks, which pumped non gasoline product to a dispenser terminal. HFA's investigation

43 *Applied Earth Sciences. Preliminary Report of Limited Geotechnical, Geologic and Environmental Investigation: Proposed Mixed-Use Commercial Development Project, 6000 Jefferson Boulevard., Los Angeles, CA 90232. January, 2016.*

found detection levels of TPH (6800mg/kg) and benzene (100mg/kg) in the soil and groundwater samples. The hydrocarbons were identified to be concentrated 6 feet below grade, in the Southeastern region of the site, moving with the northeasterly groundwater flow. Remediation took place from 1991 to 1994, with excavation of 66,000 cubic yards of soil. Ex situ bioremediation and backfilling was done on 52,000 cubic yards of the removed soil.

- A geotechnical engineering exploration report conducted by J. Buyer Group consulting (JBG) was produced in May 3, 1996. JBG observed the southern region to have uncertified fill and alluvium, while the northern region contained certified compacted fill 10 feet above backfilled gravel in the areas of previous excavation. The areas of certified fill were advised against future remedial grading. It was determined by JBG that the site is not at risk of liquefaction.

- On August 30th, 1996, the site was up for bid in the Unique Westside Bid Offering. The Standards Division of the City of Los Angeles of General Services (DGS) prepared a Geotechnical report in March, 2001, for purposing the site as a garbage collection transfer facility to transfer waste to highway trucks. DGS obtained 18 borings, soil and water sampling. Soil samples from borings B, H, M contained TPH (10-130 mg/kg). Boring H at 15' contained the highest TPH level. Four of the samples contained hydrocarbons, one of which in bedrock (boring B at 30') with 78mg/dl concentration. DGS, like HFA, found no liquefaction risk for this site.

- On February 13, 2003, Converse Consulting performed TPH testing on the site but the documentation of the specific locations where the testing was performed was not obtainable.

As part of the Geotechnical Report, laboratory analysis was performed on 17 soil samples from overall 44 soil samples from 6 environmental borings as well as 4 groundwater samples collected from bore holes. The results of the laboratory tests detected concentrations of chemicals of concern.

Volatile organic compounds (VOCs) and petroleum hydrocarbons were detected in soil and groundwater beneath the project site. Affected soil and groundwater were previously found in two areas of the property: (1) the southeastern property-corner area surrounding a former piping and tanks with associated underground storage tanks, and (2) the central area in the northern half of the site downgradient of the southeastern corner. Currently, the contamination detected at the site is primarily located in the northern section of the site—migrating to the north and northwesterly portions of the site.

Soil and/or groundwater samples from the project site were analyzed for the following chemical compounds:

- VOCs using EPA Test Method 8240 or 8260

- Petroleum hydrocarbons characterized as total recoverable petroleum hydrocarbons (TPH) using EPA Test Method 418.1 and TPH using modified EPA Test Method 8015

- Metals using EPA Test Method 6000/7000 series methodology

The primary compounds detected at the project site in terms of frequency of detection and concentrations are petroleum hydrocarbons and heavy metals. Because of the presence of sewage in the groundwater immediately downgradient of the site, other compounds are suspected to be at the project site.

With the findings in mind, a hazardous waste management plan would be required for the removal, handling, and disposal of soils during construction of the proposed project. Ex-situ treatment may be required depending on the involvement of regulatory agencies. Groundwater to be removed from the soils and from the site during de-watering operations shall be handled with the proper safety protection and procedures, and shall be treated in compliance with the regulatory requirements prior to disposal into Ballona Creek. Permits from possibly more than one agency (e.g., Regional Water Quality Control Board, City of Los Angeles Bureau of Engineering) would need to be obtained for the aforementioned de-watering, water treatment and disposal operations.

A third-party environmental services company has prepared an Interim Remedial Action Plan (IRAP) for the project site to provide for site remediation of soil and groundwater based on the preliminary project design (included as Appendix E of this Initial Study). The IRAP identifies the preferred alternatives for remediation of soil and groundwater. For soils, excavation and ex-situ treatment would be the preferred remediation option.[44] For groundwater remediation, in-situ chemical oxidation application in the identified source area, followed by on-site de-watering and ex-situ treatment, and finally implementation of a sampling analysis program would be the preferred remediation option.

Cleanup goals: A soil TPH cleanup goal for the project site was established using the RWQCB (Los Angeles Region) Petroleum Soil Screening Levels as provided in RWQCB's March 1996 Guidance Document for TPH-Impacted Sites. As outlined by the RWQCB, cleanup criteria for TPH are based on carbon-chain range identified as follows: C4-C12, C13-C22, and C23-C32.

The source area removal plan regarding VOC mass removal will remove the soil, with TPH concentrations above the recommended target cleanup value. Based on the project site hydrogeology and the RWQCB's guidelines, the recommended target TPH soil cleanup value for the project site is 1,000 mg/kg.

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44 *For the purposes of remediation activities, "ex-situ" remediation is above-ground remediation of contaminated materials after excavation. "In-situ" remediation is remediation in the subsurface without excavation.*

Water levels of VOC's and TPH stored in the Baker tanks for groundwater treatment would be below the values indicated for Commercial Cleanup values.

There are no structures on site containing asbestos containing materials (ACMs), lead based paint (LBP), or polychlorinated biphenyl (PCB), and no building demolition activities would be required for the proposed project. A Hazardous Waste Management Plan would be developed to provide procedures for the removal, handling, and disposal of soils during construction of the proposed project.

There is significant evidence of existing site contamination in both soils and groundwater at the project site. Without proper procedures in place, ground disturbance and construction activities would have an impact on these hazardous materials. As discussed above, the known site contamination must be satisfactorily mitigated for unrestricted use prior to the issuance of a building permit to reduce the risk of upset to less than significant level. Implementation of **Mitigation Measure MM-HAZ-1**, requiring the preparation of a Remedial Action Plan (RAP) per Los Angeles Fire Department (LAFD) guidelines and submitted to the LAFD for their review and approval, along with the development and implementation of a Hazardous Waste Management Plan and other regulatory requirements in coordination with the City, RWQCB, the California Department of Toxic Substances Control (DTSC), and other regulatory authorities, the impact of the existing hazardous materials on the project site would be less than significant.

Methane

The project site is within a Methane Buffer Zone identified by the City of Los Angeles Department of Building and Safety (LADBS).[45] These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category.

Methane (CH_4) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel, and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by reducing the relative concentration of oxygen in the air that is inhaled (similar to carbon monoxide). The primary danger posed by methane build-up is the risk of fire or explosion.

Methane in the atmosphere has both natural and anthropogenic (i.e., caused by humans) sources. Its atmospheric concentration is less than carbon dioxide (CO_2) and its lifetime in the atmosphere is brief (10-12 years) when compared to other gases. It is

45 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS). Accessed July 2018 online at: http://zimas.lacity.org/.*

released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete foundations, unsealed conduits, or utility trenches, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral or oblique migrations.

Worker exposure to methane is regulated by the federal Occupational Safety and Health Administration (OSHA) under CFR section 1910.146. This section regulates worker exposure to a 'hazardous atmosphere' within a confined space where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Chapter IX, Article 1, Division 71, Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. As previously noted, the project site is located within a Methane Buffer Zone, as designated by LADBS. Due to the potential environmental risk associated with Methane Buffer Zones, properties within a Methane Buffer Zone require methane testing and mitigation system based on the Design Methane Pressure and Site Design Level.

In compliance with Division 71 of the Los Angeles Building Code the future structure will be required to have an LA City approved methane mitigation system.

As discussed in **Section 8.a**, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the proposed project. Thus, there would not be a significant hazard related to accidental release of hazardous materials into the environment once the Project is occupied.

With implementation of the following regulatory compliance measures, Project impacts associated with hazards and hazardous materials would be less than significant.

Regulatory Compliance Measures:

RCM-HAZ-1 As the project site is within a methane buffer zone, prior to the issuance of a building permit, the site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the buildings. The Applicant shall implement the engineer's design

recommendations subject to the California Division of Oil, Gas, and Geothermal Resources (DOGGR), LADBS and LAFD plan review and approval.

RCM-HAZ-2 During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.

Mitigation Measure:

MM-HAZ-1 Prior to the issuance of a building permit, a Remedial Action Plan (RAP) shall be prepared per DTSC guidelines and submitted to the DTSC for their review and approval. The RAP shall discuss various methods for site remediation (i.e., decontamination, removal, etc.) and include a Hazardous Waste Management Plan. On-site soil excavation personnel shall be licensed and trained to properly handle hazardous materials encountered at the site.

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

Less Than Significant Impact. There are no existing or proposed schools within 0.25 miles of the project site. The school closest to the project site is Park Century School, approximately 0.5 miles (2,900 feet) to the northwest of the project site.

As previously discussed, construction of the proposed project would involve the use of those hazardous materials that are typically necessary for construction of mixed-use development (i.e., paints, certain building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the proposed project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the proposed project would be required to implement standard BMPs set forth by the City and the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

As previously discussed in **Section 8.a**, operation of the proposed project's commercial component would require a variety of products to be transported to and exist on site. All potentially hazardous materials transported, stored, offered for sale, or used on site for art production and daily upkeep are expected to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In addition, the proposed project would not involve the use or handling of acutely hazardous materials, substances, or waste. Compliance with existing

local, state, and federal regulations would ensure the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment

As the proposed project would comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the proposed project is not expected to adversely affect school facilities, and the impact would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the DTSC and the SWRCB, 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.[46] 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 proposed project is not located on a site that is included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List. A review of the Cortese List compiled on the DTSC, State Water Board, EnviroStor and CAL EPA showed that the site is not identified on any of these database lists. Potential impacts would be less than significant.

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

No Impact. The project site is not located within an airport land use plan or within the vicinity of a public airport or private airstrip. The nearest public airport is the Los Angeles International Airport, located approximately 3.7 miles west of the project site. There are no known private airports within the vicinity of the project site. Therefore, no impact would result in a safety hazard for people residing or working within an airport land use plan would occur.

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

No Impact. See response to **Section 8.e**, above.

46 *These lists include, but are not limited to, the 'EnviroStor' and 'GeoTracker' lists maintained by the DTSC and the SWRCB, respectively. Accessed July 2018 online at: http://www.envirostor.dtsc.ca.gov/public/; and at: http://geotracker.waterboards.ca.gov/.*

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

Less Than Significant Impact. W Jefferson Boulevard is a designated disaster route in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[47] However, the portion of W Jefferson Boulevard on which the project site is located is further west of the designated disaster route. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the project site is located proximate to a designated disaster route, neither the construction nor the operation of the proposed project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the proposed project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate circulation and emergency access. Implementation of a Construction Management Plan**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the proposed project. The majority of construction activities for the proposed project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

The design of the proposed project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. Driveways for workers and patrons of the commercial use would be located along W Jefferson Boulevard and Bowcroft Street. In addition, the Applicant would be required to submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Therefore, construction and operation of the proposed project are not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the proposed project would have a less than significant impact with respect to these issues.

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

47 *City of Los Angeles. City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles. September, 1996. (General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems. Accessed July 2018 online at: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. The project site is located in an urbanized area adjacent to the Baldwin Hills Scenic Overlook. The project site is located within a Very High Fire Hazard Severity Zone (VHFSZ)[48] within the City of Los Angeles' Local Responsibility Area (LRA). Lands designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that include fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone."

As a result, the proposed project would comply with special Los Angeles DBS requirements for buildings within the VHFHSZ, including special requirements for detached and attached trellises. The proposed project would also comply with the LAFD brush clearance requirements for properties located in the VHFHSZ, described in Regulatory Compliance Measure **RCM-HAZ-3**.

Further, the project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Therefore, with compliance with **RCM-HAZ-3**, and incorporation of all provisions of the LAMC Fire Code, the potential impacts from exposing people or structures to significant risk of loss, injury, or death involving (wildland) fires would be less than significant.

Regulatory Compliance Measure:

RCM-HAZ-3 The Project Applicant would agree to maintain the property in accordance with the LAMC 57.322. Year round compliance would be maintained as described on all native brush, weeds, grass, trees, and hazardous vegetation within 200 feet of any structures/buildings, whether those structures are on the owner's property or adjoining properties, and within 10 feet of any combustible fence or roadway/driveway used for vehicular travel.

- Maintain all weeds and grasses at a maximum height of 3 inches.
- Maintain the lower third of trees and shrubs by removing all leafy foliage, twigs, and branches up to a maximum of 6 feet from the ground.

[48] *City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA. Accessed July 2018 online at: http://navigatela.lacity.org/navigatela/.*

- Remove all dead trees and shrubs.
- Maintain 5 feet of vertical clearance between roof surfaces and portions of overhanging trees and shrubs (i.e., any overhanging foliage must be at least 5 feet from the roof).
- Remove any portion of a tree or shrub within a 10-foot radius of a chimney outlet.
- Maintain the roofs of all structures free of leaves, needles, twigs, and other combustible matter.
- Remove all dead/dry undergrowth and material within trees and shrubs to include all dead or dry palm fronds/branches.
- Once brush clearance is conducted, remove and safely dispose of all cut or bagged vegetation, all dead trees, and all debris. This includes all combustible junk, trash, or debris that may be on your property, regardless of how it got there. Combustible debris may include, but is not limited to, paper trach, cardboard boxes, household trash, fabric/clothing, plastic, rubber/tires, or piles of yard waste.
- Cut vegetation may be machine processed (chipped) and spread as ground cover (mulch) so it does not exceed 3 inches in depth within 30 feet of structures and no more than 6 inches in depth 30+ feet from structures/buildings. Machine processed/chipped material shall not be placed within 10 feet of combustible fences or road surfaces.
- Trim native shrubs/brush so foliage is removed from lower third up to a maximum of 6 feet. Native shrubs shall not exceed 216 cubic feet in volume and shall be spaced not less than 3 times its maximum height but not less than 18 feet from other native shrubs, structures, and combustible material.
- Maintain all other landscape vegetation, including, but not limited to, conifers (e.g., cedar, cypress, fir, juniper, and pine), eucalyptus, acacia, palm and pampas grass in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire or impede egress of emergency vehicles. This includes trimming up and removing all dead and dry material as required above.

- Firewood shall be located 30 feet away from any structure or shall be completely enclosed within a fire resistive closed container (LAMC Sec. 4906.3.3).

- Trim back vegetation and maintain 3 feet radius clearance around fire hydrants (LAMC Sec. 57.507.5).

- Vegetation/branches extending past the curb and over the street shall be trimmed back to the curb line and a minimum of 14 feet vertically from the roadway surface to the lowest overhanging branch to provide clearance for emergency vehicles (LAMC Sec. 57.503.1).

9. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. 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)?	☐	☐	☒	☐
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 a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. 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?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

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

As required under the NPDES, the proposed project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the proposed project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality.

During the operation, the proposed project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a (SUSMP if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the proposed

project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032 National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit and the measures outlined in the IRAP. The proposed project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Therefore, the project would result in a less than significant impact to water quality and waste discharge during its construction and operation.

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

Less Than Significant Impact. A significant impact would occur if the proposed project substantially depleted groundwater or interfered with groundwater recharge.

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District (MWD) (57 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29 percent), local groundwater (12 percent), and recycled water (2 percent).[49] Based on the City's most current Urban Water Management Plan (UWMP), in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet per year.[50;51] Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.

The Project Site is currently vacant and within the Ballona Creek watershed and thus does not afford an opportunity for groundwater recharge activities to a basin used for

49 *Los Angeles Department of Water and Power. Water: Facts and Figures. Fiscal Year 2011-2015. Accessed July 2018 online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=430938015435485.*

50 *Los Angeles Department of Water and Power. Urban Water Management Plan. 2015. Accessed July 2018 online at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=431238281039535.*

51 *One acre foot equals 325,851 gallons of water.*

water supply by the LADWP.[52] Following site redevelopment, groundwater recharge on the project site would continue to be negligible, similar to existing conditions.

As discussed above, in accordance with the City's LID Ordinance, the proposed project would include BMPs to treat stormwater. Therefore, the proposed project would not substantially interfere with groundwater recharge.

The proposed project would excavate soils beneath the project site during construction. As previously discussed, groundwater was encountered in the exploratory borings at approximately 10 to 20 feet below the surface.[53] Dewatering activities would be required during construction, and the project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the project site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the proposed project's potential impacts relating to dewatering would be less than significant.

Impacts related to groundwater supplies would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if the proposed project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The project site is located in a highly urbanized area within the City of Los Angeles in the vicinity of the Ballona Creek. The project site is vacant, and current stormwater runoff flows to the local storm drain system during a storm event.

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the proposed project. Further, the project would be required to implement an LID Plan during the project's operation, which would reduce the amount of surface water runoff leaving the project site after a storm event. The LID Plan would require the implementation of stormwater best

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52 *The major tributaries to the Ballona Creek watershed include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. Ballona Creek is designed to discharge stormwater to Santa Monica Bay, rather than act as a recharge basin.*

53 *Applied Earth Sciences Inc. Preliminary Report of Limited Geotechnical, Geologic, and Environmental Investigation. January, 2016, included as Appendix D to this Initial Study.*

management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not 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 a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed above under **Section 9.c**, implementation of the proposed project is not anticipated to substantially change the drainage pattern on the project site. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or –off-site. As such, impacts would be less than significant.

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?

Less Than Significant Impact.

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 effectively alleviate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, 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 can also be sources of stormwater pollution and soil contamination.

Grading activities can cause erosion. 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 would be secured to control off-site migration of pollutants.

As required under the NPDES, the proposed project would be responsible for the preparation of a SWPPP and the implementation of BMPs as outlined above to mitigate the inherent potential for sedimentation and other pollutants entering the stormwater

system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the proposed project would not provide substantial additional sources of polluted runoff. 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, the SWRCB and the proposed project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the proposed project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level.

Development of the proposed project would result in a net increase of overall stormwater runoff volume as approximately 50 percent of the project site is currently pervious surfaces. Final plan check by the Los Angeles Bureau of Sanitation (BOS) would ensure that adequate capacity is available in the storm drain system in the surrounding streets prior to final project approval. The project would have to provide any necessary improvements to the storm drain infrastructure, as well as any extensions to the existing system in the area. Therefore impacts related to the capacity of the storm drain system would be less than significant.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. See Sections 9.a and 9.e, above. The project does not include other potential sources of contaminants which could potentially degrade water quality.

Further, as previously discussed, to address water quality during the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber

rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles BOE for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would be required to comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to water quality would be less than significant, and no further analysis of this issue is required.

During the project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational water quality would be less than significant.

g) 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. The proposed project does not propose new housing; therefore, the proposed project would not involve development of new housing within a 100-year flood hazard area, and would have no impact.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk**.** The project site is in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.[54] Therefore, the proposed project would not involve the development of new housing and/or structures within an identified 100-year flood hazard area. Impacts would be less than significant.

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

No Impact. The project site is not located within a potential inundation area.[55] The perimeter bordering the proposed development site is classified as an area of minimal

54 *FEMA Flood Insurance Rate Map No. 06037C1595F, effective as of 09/26/2008. Accessed July 2018 online at: https://msc.fema.gov/portal.*

55 *FEMA Flood Insurance Rate Map No. 06037C1595F, effective as of 09/26/2008. Accessed July 2018 online at: https://msc.fema.gov/portal.*

flood risk (Zone X) and is not located within a 100-year flood zone. The Ballona Creek channel across W Jefferson Boulevard from the project site is channelized, and there is a 1 percent annual chance flood discharge contained within the channel. As such, there would be no impacts related to potential inundation from the failure of a levee or dam.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. The project site is not located within a coastal area, and no water bodies are on or adjacent to the project area that would impact future projects due to a seiche. Impacts would be less than significant.

A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Often, the first wave of a tsunami is not the largest. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its inland location, the project site is not susceptible to tsunamis.[56] Impacts would be less than significant in this regard.

In addition, given the developed nature of the project area, there are no features adjacent to the project area capable of inundating the site by mudflow. Thus, no impacts are anticipated with regard to the inundation by seiche, tsunami, or mudflow. No further analysis is required.

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56 *City of Los Angeles. General Plan, Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas. 1996. Accessed July 2018 online at: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

10. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Would the project:

a) Physically divide an established community?

No Impact. The land uses within the general vicinity of the project site are characterized by a mix of limited industrial, manufacturing, and open space. The project site is comprised of one parcel and is not developed with any buildings or existing uses.

The project is an infill development in an area with a mix of uses, and would not physically divide an established community, and there would be no impact.

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

Less Than Significant Impact. The project site would be rezoned M1-1 (limited industrial). The General Plan land use designation for the project site is Limited Industrial. The West Adams-Baldwin Hills-Leimert includes several goals, objectives, and policies that would be applicable to the proposed project.

City of Los Angeles General Plan (Framework Element)

The Project's consistency with the General Plan Framework Element land use policies is discussed in **Table LU-1**, **Project Consistency with Applicable Policies of the General Plan Framework Element**. As shown therein, the Project would be consistent with many of the applicable policies and therefore, no significant impacts would occur.

Table LU-1
Project Consistency with Applicable Policies of the General Plan Framework Element

Objective	Consistency Discussion
Land Use Chapter	
3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural /institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses to the project site. The Project would provide employment opportunities, as well as retail/restaurant uses, to serve existing and future residents as well as visitors.
3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses in close proximity to the Metro Station at Jefferson Boulevard and La Cienega Boulevard. In addition, the Project is adjacent to two major thoroughfares along Jefferson Boulevard and La Cienega Boulevard, which provide bus lines and commercial and retail opportunities.
3.2.2 Establish, through the Framework Long Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses in close proximity to the Metro Station at Jefferson Boulevard and La Cienega Boulevard. In addition, the Project is adjacent to two major thoroughfares along Jefferson Boulevard and La Cienega Boulevard, which provide bus lines and commercial and retail opportunities.
3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project would be a pedestrian-friendly development given its pedestrian/bicycle access to the site from Jefferson Boulevard and La Cienega Boulevard. These pedestrian/bicycle linkages would provide important connections to the existing surrounding uses and public transportation, including the Metro Station at Jefferson Boulevard and La Cienega Boulevard. In addition, the Project would encourage biking due to the inclusion of 60 bicycle parking spaces.
3.2.4 Provide for the siting and design of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The nearest single-family residences approximately 1,000 feet away, are buffered from the Project Site by existing structures and infrastructure (i.e., Ballona Creek to the north and La Cienega Boulevard to the east).

Objective	Consistency Discussion
3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	**Consistent.** The nearest single-family residences are buffered from the Project Site by existing structures and infrastructure (i.e., Ballona Creek to the north and La Cienega Boulevard to the east). The Project would not encroach on the single-family neighborhoods.
Source: City of Los Angeles General Plan; Impact Sciences July 2018	

West Adams-Baldwin Hills-Leimert Community Plan

Consistency with Community Plan Land Use Designation

As discussed previously, the Community Plan designates the Project Site for Limited Industrial land uses. The Project would include a mix of office, retail/restaurant, manufacturing (roasting and baking), and warehouse uses that would be consistent with the existing Limited Industrial land use designation for the Project Site.

Consistency with Community Plan Policies

Consistency of the Project with the applicable polices of the West Adams Community Plan is included on **Table LU-2**, **Project Consistency with Applicable Policies of the West Adams-Baldwin Hills-Leimert Community Plan**. As discussed, the Project would be consistent with all of the Community Plan policies that are applicable. Therefore, Project impacts related to consistency with the West Adams Community Plan would be less than significant.

Table LU-2
Project Consistency with Applicable Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal LU65: A community where existing and future industrial uses which contribute job opportunities for residents are provided and which minimize environmental and visual impacts to the community.	
Policies	**Consistency Discussion**
LU65-1 Maintain Existing Industrial Land Where Appropriate. Maintain existing industrial land uses where appropriate as well as designate lands for new emerging industry including industrial parks, research and development facilities, light manufacturing, and other similar uses which provide employment opportunities.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses to the project site providing at least 200+ permanent employment opportunities, as well as retail/restaurant uses, to serve existing and future residents.

Policies	Consistency Discussion
LU65-2 Capitalize on Emerging Industrial Sectors. Capitalize on rehabilitation and adaptive reuse of existing structures, as well as the introduction of contextual new infill construction in areas such as the Hyde Park Industrial Corridor. Provide land use incentives and standards that facilitate the generation of high wage jobs and training for the community especially within the growing "clean-tech" and "green tech" sectors.	**Not Applicable.** There are no existing structures on the project site and the site is not located in the Hyde Park Industrial Corridor.
LU65-3 High Quality Projects. Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses to the project site. The Project's design and landscaping would be consistent with the City's applicable design standards in the Community Plan, and the Walkability Checklist, and the Citywide Design Guidelines (refer to Appendix B of this Initial Study). In addition, the Project would be constructed of high quality architectural materials, and would include landscaping and open spaces throughout the site and in between Project buildings.
LU65-4 Compatibility with Adjoining Uses. Achieve adequate compatibility through design treatments, compliance with environmental protection standards, and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.	**Consistent.** The nearest single-family residences are buffered from the Project Site by existing structures and infrastructure (i.e., Ballona Creek to the north and La Cienega Boulevard to the east). The Project would not encroach on the single-family neighborhoods.
LU65-5 Transition Height to Residential. Mitigate the potential negative impact of the height of industrial uses located in close proximity to residential uses by requiring landscape and open space transitions along edges adjacent to residential uses.	**Consistent.** The nearest single-family residences, approximately 1,000 feet away, are buffered from the Project Site by existing structures and infrastructure (i.e., Ballona Creek to the north and La Cienega Boulevard to the east). The Project would not encroach on the single-family neighborhoods.
LU65-6 Clarify Development Parameters. Ensure clarity of development parameters by promoting context sensitive projects at "brownfield" and other underutilized industrial sites by establishing tailored maximum allowable height and building intensity parameters.	**Consistent.** The Project would introduce a mix of office, retail/restaurant, manufacturing (roasting), and warehouse uses to the project site. As part of the development of the proposed project, the existing contaminated soil conditions would be remediated. The proposed project would develop an underutilized industrial site by permitting the Zone Change/Height District Change from "1VL" to "1".
Source: City of Los Angeles, West Adams-Baldwin Hills-Leimert Community Plan, adopted June 2016; Impact Sciences July 2018	

City of Los Angeles General Provisions and Zoning Code

Permitted Uses

As discussed previously, the Project Site is located in the M1 (Limited Industrial) zone. Uses that are allowed in the M1 zone generally include those uses allowed in the C1, C1.5, and C2 zones. Permitted uses therefore include, among others: restaurants,

business and professional offices, medical clinics and laboratories, grocery stores, retail and service stores, pharmacies, drugstores, manufacturing and industrial activities, research and development, storage, and parking. The Project would a mix of office, retail/restaurant, manufacturing (roasting and baking), and warehouse uses that would be consistent with the existing M1 zoning for the Project Site. Therefore, the Project would conform to the zoning for the Project Site, and impacts would be less than significant.

Height and Density Limitations

Under the existing M1-1VL zoning, buildings and structures on the Project Site are limited to an FAR of 1.5:1, with a maximum height of 45 feet (and 3 stories for residential uses). As discussed above, the Project Applicant is requesting a Zone Change/Height District Change from "1VL" to "1", pursuant to LAMC Section 12.32(Q). The "1" Height District designation would allow a maximum FAR of 1.5:1 and no height limit. With approval of these requests, the Project's maximum height of 85' (6-stories) and FAR of 1.37:1 would be consistent with the zoning for the Project Site, and impacts would be less than significant.

The changes to the entitlements would not result in environmental impacts, and would be reviewed and approved by the appropriate regulatory authority. Therefore, there would be a less than significant impact on land use plans, policies, or regulations of agencies with jurisdiction over the project.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As previously stated in **Section 4.f, Biological Resources**, the project site is not located with the confines of a Habitat Conservation Plan, Natural Community Conservation Plan, or SEA. Therefore, the proposed project would not conflict with the provisions of an applicable habitat conservation plan or natural community conservation plan. No impacts would occur.

11. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Would the project:

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

No Impact. The project site would be rezoned M1-1, and thus is not zoned for oil extraction and drilling, or mining of mineral resources[57], and there are no such sites at the project site. Further, the project site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.[58]

The project would involve the development of two buildings, and would not involve any new oil or mineral extraction activities. Therefore, development of the 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.

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

No Impact. See response to **Section 11.a**, above.

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57 *Sites with known mineral resources are generally known as Mineral Resource Zones (MRZ), as classified by the California Geologic Survey (CGS).*

58 *City of Los Angeles, Conservation Element Exhibit A, Mineral Resources Map, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

12. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	☐	☒	☐	☐
b. Exposure of persons 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?	☐	☐	☐	☒

Would the project would result in:

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

Less Than Significant with Mitigation Incorporated. A significant construction impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of LAMC (Municipal Code Ordinance No. 41.40 and 112.05) or exceed the L.A. CEQA Thresholds Guide criteria.

Significance Criteria

The LAMC contains the following regulations applicable to the project's construction activities:

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

Section 41.40(a) would prohibit project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

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

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

> *Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.*

The LAMC also contains provisions that would regulate the project's operational noise impacts. Shown below, Sec.112.01 would prohibit amplified noises, especially those from outdoor sources (e.g., speakers, stereo systems), from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the project's property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Sec.112.02(a), below, would prevent project HVAC systems from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

Construction Noise Impacts

On-Site Construction Activity

During demolition, grading, construction, and other project phases, noise-generating activities could occur at the project site between the hours of 7:00 a.m. and 9:00 p.m. Monday through Friday, in accordance with Sec.41.40 of the LAMC. Land uses surrounding the project site include single- and multi-family residences, park, and commercial land-uses. The nearest sensitive receptors to the proposed project are:

- Baldwin Hills Scenic Overlook located approximately 300 feet to the west of the project site;
- Single-family residences located approximately 600 feet to the southeast of the project site; and
- Single- and multi-family residences located approximately 950 feet to the east of the project site.

On July 3, 2018, short-term, 15-minute noise readings were conducted at these receptors to ascertain their current ambient noise levels.[59] As shown in **Table N-2**, **Construction Noise Level – Unmitigated**, the ambient noise levels were between 60.4 and 69.2 dBA L_{eq}.

59 *Noise measurements were taken using a Brüel & Kjaer 2237 Sound Level Meter. This meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, and positioned at approximately five feet above the ground.*

Construction of the proposed project would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as bulldozers, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries. Typical sound levels associated with construction equipment are shown in **Table N-1, Maximum Noise Levels Generated by Typical Construction Equipment, L_{max}.** For this analysis, construction noise impacts were modeled using the noise reference level for a grader, which can produce average peak noise levels of 85 dBA at a reference distance of 50 feet.[60] Because graders and other similar tractor-type vehicles are expected to be the loudest and most extensively used pieces of heavy equipment during construction of the proposed project, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction activities would not exceed those analyzed here.

Table N-1
Maximum Noise Levels Generated by
Typical Construction Equipment, L_{max}

Type of Equipment	Actual Measured Noise Level (dBA at 50 feet)
Air Compressor	78
Backhoe	78
Concrete Mixer Truck	79
Crane	81
Dozer	82
Generator	81
Grader	85[a]
Paver	77
Pump	81
Roller	80
Tractor	84[a]
Welder	74

Sources: FHWA, Highway Construction Noise Handbook, 2006.

As shown in **Table N-2**, C**onstruction Noise Level – Unmitigated,** the nearest residences are projected to experience noise levels of 60.7 dBA, an increase of 10.1 dBA. The maximum sound level of 69.7 dBA would occur at the Baldwin Hills Scenic Overlook. These sound levels exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period. The project's construction noise levels would not exceed LAMC Sec.112.05's 75 dBA limit for powered construction equipment within 500 feet of residential zones.

60 *Federal Highway Administration, Highway Construction Noise Handbook, 2006.*

In order to reduce construction noise levels, the project applicant shall adhere to Ordinance No. 178048, which would notify sensitive receptors of future construction activities as detailed in **Regulatory Compliance Measure RCM-NOI-1**. In addition to this, the Project Applicant is required to implement mitigation measure **MM-NOI-1**, which requires noise attenuating barriers to be erected prior to construction. These measures would reduce construction noise below City thresholds, and on-site construction-related noise impacts would be **less than significant with mitigation incorporated**.

Table N-2
Construction Noise Level - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	Increase
Baldwin Hills Scenic Overlook	300	69.7	59.7[1]	10.0
Single-family residences approximately 600 feet to the southeast	600	60.7	50.6	10.1
Single- and multi-family residences approximately 950 feet to the east	950	56.7	59.7	0.0

Source: Impact Sciences, 2018.
[1] *The sound level measurement conducted at the residences to the east of the project site was applied to the Baldwin Hills Scenic Overlook.*

Off-Site Construction Haul Truck Activity

With regard to off-site construction-related noise impacts, grading activities could necessitate up to approximately 287 haul trips per work day over the course of grading activities to export excavated soils and materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land use. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.[61] Though the addition of haul trucks would alter the fleet mix of the anticipated haul route, their addition to local roadways would not double those roads' traffic volumes, let alone increase their traffic to levels capable of producing 5 dBA ambient noise increases. However, trucks accessing the proposed project site, while not significantly increasing ambient noise levels, have the potential to instantaneously increase noise levels as each truck passes nearby sensitive receptors. These temporary instantaneous noise level increases may reach a maximum range of approximately 76 to 88 dBA at 50 feet from the source.[62,63]

[61] *City of Los Angeles, L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles. Page 2006.*
[62] *Ibid.*

Mitigation measures **MM-NOI-2** and **MM-NOI-3** would reduce these impacts to the furthest extent technically feasible. As a result, off-site construction noise impacts related to haul trips would be considered **less than significant with mitigation incorporated**.

Regulatory Compliance Measure

RCM-NOI-1 The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measure

MM-NOI-1 Prior to issuance of a grading permit, the construction contractor or its designees shall install temporary noise barriers at least 10 feet in height and capable of attenuating on-site construction noises by at least 6 dBA (e.g., 1" plywood with acoustical blankets).

MM-NOI-2 Trucks, including construction haul trucks and construction equipment and material delivery vehicles, shall avoid accessing residential streets and streets which pass by schools and other sensitive receptors identified above.

MM-NOI-3 Trucks, including construction haul trucks and construction equipment and material delivery vehicles, shall maintain a distance of no less than 50 feet from residences, parks, and other sensitive receptors identified above.

Residual Impacts

Residual impacts would be less than significant.

63 *Federal Transit Administration, Transit Noise and Vibration Impact Assessment. May 2006.*

Operational Noise Impacts

HVAC Systems

The HVAC system that would be installed for the proposed project would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. As discussed previously, CNELs for constant noise sources are about 6.7 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the proposed project could generate noise levels that average from 47 to 57 dBA CNEL at 50 feet from the source when the equipment is operating continuously over a 24-hour period. However, as part Project Design Feature PDF-NOI-1, these HVAC units would be mounted on the rooftop of the proposed building and would be screened from view by parapets and/or walls, as well as being provided with proper shielding to reduce noise levels. The shielding that would be installed around these systems would typically reduce noise levels by approximately 15 dBA. Thus, the noise levels from these HVAC systems could be reduced to between approximately 32 to 42 dBA L_{eq} at 50 feet from the equipment, which would result in noise levels of approximately 38.7 to 48.7 dBA CNEL. These noise levels would not exceed the City's exterior noise level standard of 60 dBA CNEL for single-family residences, 65 dBA CNEL for multi-family residences and 70 dBA CNEL for schools, and would also comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on adjacent properties by more than 5 dBA. Therefore, this impact would be less than significant. No further analysis is required.

Project Design Feature

PDF-NOI-1: All HVAC units shall be mounted on the rooftop of the proposed buildings and shall be screened from view by parapets and/or walls, as well as being provided with proper shielding to reduce noise levels. The shielding to be installed around these systems shall reduce noise levels by a minimum of 15 dBA.

Parking Facilities

It is anticipated that sources of noise from the parking facilities would include tires squealing, engines accelerating, doors slamming, and car alarms. Noise levels at the parking facilities would fluctuate with the amount of automobile and human activity at the site. During times when the largest number of people would enter and exit the project site, the noise levels would range from 60 to 70 dBA L_{eq}. There would also be times in the day when very little activity occurs and the noise levels average 50 to 60 dBA L_{eq}.

Although the majority of on-site parking will be contained within the subterranean parking structure on the project site, there will be at-grade parking as well. However, as the nearest sensitive receptors at the Baldwin Hills Scenic Overlook are approximately 300

feet from the project site, parking activity is not anticipated to cause an audible increase in noise levels. Parking noise would not be anticipated to be perceptible at off-site sensitive receptors. Thus, impacts associated with noise generated as a result of parking activity at the proposed project would not adversely affect the sensitive receptors adjacent to the project site, and this impact would be less than significant. No further analysis is required.

Traffic Noise

The majority of the project's operational noise impacts would be from indirect mobile noise impacts associated with new daily vehicle trips.[64] As noted above, according to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume. According to the traffic study prepared for the project, the project would not contribute to traffic volumes that would result in an audible noise increase at any roadway segments in the project area. As a result, the project's off-site vehicular noise impacts would be considered less than significant. No further analysis is necessary.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Significance Criteria

The FTA has published guidelines for assessing the impacts of ground borne vibration associated with construction activities, which have been applied by other jurisdictions to other types of projects. According to FTA guidelines, the vibration threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec PPV and 0.5 in/sec PPV for reinforced concrete, steel, or timber buildings. For institutional land uses such as schools, churches, and offices experiencing occasional events of ground-borne vibration or noise from transient sources, the FTA has established a threshold of 78 VdB.[65] For recording and TV studio land uses, the threshold is 65 VdB for all events.[66] There are no FHWA standards for traffic-related vibrations.[67] The vibration threshold of perception is 0.01 inch/second PPV, which is approximately equal to 94 vibration decibels (VdB).[68] The FTA has also set standards that address the effect of long-term vibration on human annoyance. Ground-borne

64 *Overland Traffic Consultants, 6024 Jefferson Mixed-Use Traffic Impact Study. July 2018.*

65 *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

66 *Ibid.*

67 *US Department of Transportation, Federal Transit Administration, Office of Planning and Environment, Transit and Vibration Impact Assessment, FTA-VA-90-1003-06, May 2006.*

68 *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, FTA-VA-90-1003-06, 2006, 12-13.*

vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep.

Table N-3, Land Use Disruption Vibration Thresholds, summarizes FTA vibration thresholds for land use disruption from vibration impacts.

Table N-3
Land Use Disruption Vibration Thresholds

Building Category	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep.	72	75	80
Institutional land uses with primarily daytime use	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80
Source: FTA, 2006.			

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts, as well as human annoyance impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[69]

Table N-4, Building Damage Vibration Thresholds (PPV), summarizes Caltrans' vibration thresholds for building and structural damage.

69 *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

Table N-4
Building Damage Vibration Thresholds (PPV)

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50
Source: California Department of Transportation, 2013.		

Table N-5, Human Annoyance Vibration Thresholds, summarizes Caltrans' vibration thresholds for human annoyance.

Table N-5
Human Annoyance Vibration Thresholds (PPV)

Human Response	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous / Frequent / Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.00	0.40
Source: California Department of Transportation, 2013.		

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, Caltrans' adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to project construction.

Construction Vibration Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. **Table N-6, Vibration Source Levels for Commonly Used Construction Equipment (PPV)**, shows vibration levels associated with various types of construction equipment.

Table N-6
Vibration Source Levels for Commonly Used Construction Equipment (PPV)

Human Response	Approximate PPV (in/sec) at 25 Feet	Approximate RMS (VdB) at 25 Feet
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58
Source: California Department of Transportation, 2013.		

Ground-borne vibration would be primarily generated by a number of on-site construction activities. As a result of construction activity generating up to 0.089 inches per second PPV (87 VdB), vibration velocities of up to 0.002 inches per second PPV (55 VdB) could occur at the nearest off-site structures (**Table N-7, Building Damage Vibration Levels At Off-Site Structures - Unmitigated** and **Table N-8 Human Annoyance Vibration Levels At Off-Site Structures - Unmitigated,**). This vibration intensity is below the 0.5 inches per second PPV building damage threshold for older residences, the 0.04 inches per second human annoyance threshold, and below the 80 VdB land use disruption threshold (**Table N-9, Land Use Interference - Unmitigated**). More distant receptors would experience even lower vibration levels.

Given that other construction equipment and activities would produce less vibration and have reduced impacts on nearby receptors, construction-related structural vibration impacts would be considered less than significant. No further analysis is required.

Table N-7
Building Damage Vibration Levels At Off-Site Structures - Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	FTA Structural Significance Threshold (in/sec)	Significant?
Baldwin Hills Scenic Overlook	300	0.002	N/A	**No**
Single-family residences approximately 600 feet to the southeast	600	0.001	0.5	**No**
Single- and multi-family residences approximately 950 feet to the east	950	<0.001	0.5	**No**
Source: Impact Sciences, 2018.				

Table N-8
Human Annoyance Vibration Levels At Off-Site Structures - Unmitigated

Off-Site Receptors	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Caltrans Annoyance Significance Threshold (in/sec)	Significant?
Baldwin Hills Scenic Overlook	300	0.002	0.04	**No**
Single-family residences approximately 600 feet to the southeast	600	0.001	0.04	**No**
Single- and multi-family residences approximately 950 feet to the east	950	<0.001	0.04	**No**
Source: Impact Sciences, 2018.				

Table N-9
Land Use Interference - Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated VdB	FTA Land-Use Interference Threshold (VdB)	Significant?
Baldwin Hills Scenic Overlook	300	55	N/A	**No**
Single-family residences approximately 600 feet to the southeast	600	46	75	**No**
Single- and multi-family residences approximately 950 feet to the east	950	40	75	**No**
Source: Impact Sciences, 2018.				

Operational Vibration Impacts

During operation of the proposed project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on local roadways. However, road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibration levels far below levels associated with land use disruption, and would as a result be considered less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact may occur if a project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the project site during the operation of the project.

As discussed above, the majority of the project's operational noise impacts would be from indirect mobile noise impacts associated with new daily vehicle trips. This, the addition of future traffic from any new developments in the project area, and overall ambient traffic growth would elevate ambient noise levels along local roadways. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume. According to the traffic study prepared for the project, the project would not contribute to cumulative traffic volumes that would result in an audible noise increase at any roadway segments in the project area. As a result, the project's individual and cumulative mobile source noise impacts would be considered less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact may occur if the proposed project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the proposed project.

As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. However, as shown in **Table N-2** above, construction noise levels would not exceed City thresholds. The project's construction noise impacts would be considered less than significant. No further analysis is required.

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. Based upon the criteria established in the City of Los Angeles *Draft L.A. CEQA Thresholds Guide*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater.

The project site is approximately 4.75 miles northeast of the LAX airport. The LAX 65 dBA CNEL noise contour does not extend north past Manchester Boulevard, which is approximately four miles to the south of the project site.[70] Due to the distance, noise sensitive receptors near the project site would not be exposed to ambient noise levels over 65 dBA CNEL from aircraft related noise.

The project site is outside of noise contours for LAX which would increase sound levels at nearby sensitive receptors to exceed land use compatibility thresholds. Therefore, no impact would occur. No further analysis is required.

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

No Impact. Based upon the criteria established in the City of Los Angeles *Draft L.A. CEQA Thresholds Guide*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater. This question would apply to a project only if the project site were in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations.

The project site is not located within the vicinity of a private airstrip. No impact would occur. No further analysis is required.

70 *Los Angeles International Airport, LAX Master Plan Final EIS/EIR, Figure F4.1-6, April, 2004.*

13. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Would the project:

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

Less Than Significant Impact. As previously discussed, the project site is located within the jurisdiction of SCAG. SCAG's mandated responsibilities include development of plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP), and the Regional Housing Needs Assessment (RHNA), in coordination with other population employment, and housing projections for the regions and its subdivisions. In 2017, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan / Sustainable Community Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projects of population, households, and employment through the horizon year.

The proposed project is a commercial development, consisting of approximately 2,200 sf of restaurant/retail (coffee shop) use, up to 90,054 sf of corporate office space, up to 53,762 sf of light manufacturing (coffee roasting) use, and up to 50,775 sf of warehouse space. The project would also include two plaza areas; one 3,290 sf plaza along the Building A Jefferson Boulevard frontage, and one 18,905 sf plaza and garden area between Building A and Building B, and a parking structure with two above-ground levels and four subterranean levels.

As an infill development, the project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the project would utilize the existing facilities. The project does not propose any new residential units; however, the project would introduce new employment opportunities.

According to SCAG's Profile of the City of Los Angeles (2016)[71], the City's average household size was 2.9 in 2016. The proposed project is not anticipated to have an effect on the population as it does not propose new residential units.

The proposed project is estimated to generate approximately 200+ jobs. It is strongly documented in the updated West Adams-Baldwin Hills-Leimert Community Area Plan that the City seeks to increase employment in industrial areas to provide improved opportunities for City residents, maintain the City's jobs-housing ratio, reduce the need of City residents to commute to remote work locations, and to help maintain the City's fiscal health. According to SCAG, the City has an estimated 1,783,626 jobs in 2015, with an increase of 10,389 jobs from 2014 to 2015 alone.[72] The 200+ increase in new jobs resulting from the proposed project would not be considered substantial in context of the total number of jobs present in the City (less than one percent). Therefore, the proposed project would not directly induce substantial population growth in the project area, and impacts would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing exists on the project site. The site is currently undeveloped. The proposed project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. No impacts would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. See response to **Section 13.b**, above.

71 *Southern California Association of Governments' (SCAG). SCAG Profile of the City of Los Angeles. 2017. Accessed online July 2018 at: https://www.scag.ca.gov/Documents/LosAngeles.pdf.*

72 *Ibid.*

14. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which 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:

i) Fire protection?

Less Than Significant Impact. The proposed project is a commercial development, consisting of up to 2,200 sf of restaurant/retail (coffee shop) use, 90,054 sf of corporate office use, up to 53,762 sf of light manufacturing (coffee roasting) use and 50,775 sf of warehouse space . The project would also include two plaza areas; one 3,290 sf plaza along the Building A Jefferson Boulevard frontage, and one 18,905 sf plaza and garden area between Building A and Building B, and two parking structures, one with three subterranean levels and one with two above-ground levels and four subterranean levels. The project would incorporate all applicable provisions of the LAMC Fire Code (LAFC), including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Notwithstanding the above, implementation of the proposed project could result in an increase in demand for fire protection and emergency medical services. LAFD will be consulted regarding existing firefighting resources available to serve the project site and whether construction

and/or operation of the proposed project would require additional firefighting resources.

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 LAFD considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 507.3.3, Table 507.3.3, of the 2014 City of LAFC, the maximum response distance between industrial/commercial land uses and a LAFD fire station that houses an engine company or truck company is 1 mile or 1.5 miles, respectively. Minimum fire flow requirement for high-density residential land uses is 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously.[73] If either of these distances were exceeded, all structures located in the applicable residential buildings would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

The project site is located within the South Bureau, Battalion 18 of the LAFD. The Proposed Project site would be served by the LAFD Station No. 94, located at 4470 Coliseum Street, approximately two miles east of the site. As a result, the proposed project would include automatic fire sprinkler systems; with such systems.

The proposed project would be required to comply with the 2017 LAFC and any subsequent codes prior to the issuance of any construction permits, including the requirements for automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). Construction of the proposed project would require the installation and/or upgrade of the existing utilities on the site, including the water supply infrastructure. Thus, the infrastructure would be designed and constructed in accordance with the specifications included in the 2017 LAFC, including the fire flow requirements outlined in Section 507.

A fire flow test would be performed during the permit review period to determine if any utility improvements are needed on the site and/or for the surrounding area to ensure adequate fire flows and infrastructure pursuant to the 2017 LAFC. Pursuant to the LAFC, all required infrastructure improvements would be operational prior to construction and/or operation of the proposed project.

[73] *City of Los Angeles. City of Los Angeles Fire Code, page 98. 2017. Accessed online July 2018 at: https://codes.iccsafe.org/public/chapter/content/10256/.*

Access to the project site would be from W Jefferson Boulevard. A drive-thru area for the restaurant space would be located at the front of Building A, and surface parking and access route to the parking lot in Building B would be from the eastern edge of the project site. All ingress/egress points would be constructed in conformance with the requirements of City standards, including LAFD access requirements. Consequently, emergency service responders would be able to access the project site and impacts would be less than significant.

Based on the above information, implementation of the proposed project would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire and/or emergency facilities and/or the need for new or physically altered fire and/or emergency facilities. The construction of these facilities could cause significant environmental impacts in order to maintain acceptable response times or other performance objectives.

In addition, with the site plan review Regulatory Compliance Measure **RCM-PS-1**, listed below, the project would have a less-that-significant impact on fire protection services.

Regulatory Compliance Measure:

RCM-PS-1: The proposed project shall incorporate all recommendations of the Fire Department relative to fire safety 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 units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii) Police protection?

Less Than Significant Impact. The Los Angeles Police Department (LAPD) is responsible for providing police protection services to the project site. A significant impact may occur if the LAPD could not adequately serve a project, necessitating a new or physically altered station. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the proposed, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project build out compared to the expected level of service available; and

(c) whether the project includes security and/or design features that would reduce the demand for police services.

The project site is assigned to LAPD South Bureau in the Southwest Area. The Southwest Community Police Station is located at 1546 W Martin Luther King Jr Boulevard, approximately 4.6 miles from the project site. There is a Southwest Substation located at 3650 W Martin Luther King Jr Boulevard, approximately 2.8 miles from the project site. A Substation is an off-site facility where people can report non-emergency crimes. Within the Southwest Area, the project site is located within Reporting District (RD) 341. **Table PS-1**, Southwest Area Crime Statistics, below, shows the year to date crime statistics for the Southwest Area Police Station service area.

Table PS-1 Southwest Area Crime Statistics

Type of Crime	2016[a]	2017[a]	2018[a]
Part I Crimes[b]			
Violent Crimes			
Homicide	17	10	14
Rape	64	72	63
Robbery	400	409	411
Aggravated Assault	590	664	622
Subtotal	**1,071**	**1,155**	**1,110**
Property Crimes			
Burglary	409	405	379
Motor Vehicle Theft	461	493	421
Burglary – Theft from Vehicle	728	748	819
Personal / Other	1,134	1,149	1,255
Subtotal	**2,732**	**2,795**	**2,874**
Total 'Part 1' Crimes	**3,803**	**3,950**	**3,984**
Part II Crimes[b]			
Child/Spousal Abuse	603	546	543
Shots Fired	120	94	92
Shooting Victims	52	49	40

a – year-to-date (comparative for previous years)

b – crimes statistics are divided into categories to comply with the FBI's 'Uniform Crime Reporting Guidelines'.

Source: Los Angeles Police Department. Southwest Area Profile. 06/03/16-06/30/18. Accessed July 2018 online at: http://assets.lapdonline.org/assets/pdf/sowprof.pdf.

Response times are an additional metric used by the LAPD to measure the adequacy of police service. Response time is defined as the total time from when a call requesting assistance is made until the time the first unit responds to the

scene. Calls for police assistance are prioritized based on the type of call. Currently the LAPD's response time goal is seven minutes for high-priority calls and 40 minutes for non-emergency calls.

Implementation of the proposed project would not result in an increase of residents but would result in an increase to the number of visitors to the project site, thereby potentially generating an increase in the number of service calls originating the project site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials.

The proposed project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the buildings would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of workers at all times of the day would provide a sense of security during evening and early morning hours. As such, the project occupants would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD.

With the adherence to the Regulatory Compliance Measures **RCM-PS-2** and **RCM-PS-3** identified below, the Proposed Project's potential impact upon LAPD services would be considered less than significant.

Regulatory Compliance Measures:

RCM-PS-2: During construction, security measures shall be provided including security fencing, lighting, and locked entries around the construction zones.

RCM-PS-3: The project plans shall incorporate design elements 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, as outlined in "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 LAPD prior to the issuance of building permits.

iii) Schools?

Less Than Significant Impact. The project site is located within the boundaries of the Los Angeles Unified School District (LAUSD). A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project build out compared to the expected level of service available (consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand); (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Implementation of the proposed project would not include construction of new residential units, and therefore would not increase the number of students attending the surrounding LAUSD schools. Therefore, the proposed project's potential impact on public school services would be less than significant.

iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000

persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. The Recreation Plan notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are citywide goals and are not intended to be requirements for individual development projects.

Implementation of the proposed project would not lead to an increase in population, and therefore is not anticipated to cause a direct increase in the demand for neighborhood, or community parks. Although the proposed project is anticipated to increase the number of daytime activity in the area resulting from the restaurant/retail space and jobs, the project would provide outdoor space for restaurant/retail customers and office workers in the form of two plaza areas; one 3,290 sf plaza along the Building A Jefferson Boulevard frontage, and one 18,905 sf plaza and garden area between Building A and Building B.

Construction and operation of the proposed project is not anticipated to have an impact on parks or recreation areas in the vicinity of the project site because the project would not increase the number of residents in the area, and the daytime visitors and workers to the site would have access to on-site plaza and garden areas. Therefore, the proposed project would have a less than significant impact on parks.

v) Other Public Facilities?

Potentially Significant Impact.

A significant impact would occur if the project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the project site and the project area.

The need for public library services is generally calculated based on permanent population in a given area. As discussed, the proposed project does not include any new dwelling units, and therefore would not increase the demand for public library services or have an adverse impact public libraries. The proposed project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered library facilities, the construction of which could cause environmental impacts. Impacts would be less than significant.

15. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. See response to **Section 14.a.iv**, above.

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. See response to **Section 14.a.iv**, above.

16. TRANSPORTATION AND TRAFFIC

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 due 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?	☐	☐	☒	☐

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant with Mitigation Incorporated. The proposed project is an infill mixed-use development, consisting of up to 2,200 sf of restaurant/retail (coffee shop)

use, up to 53,762 sf of light manufacturing (coffee roasting) use, up to 50,775 sf of warehouse space, and up to 90,054 sf of corporate office space. The proposed project would provide up to 828 vehicle parking spaces in at and below grade parking structures, as well as 61 bicycle parking spaces. Building B would also have approximately 13,052 sf of outdoor balcony space.

The following transportation and traffic analysis was based on the report entitled "Traffic Impact Analysis For a Proposed Mixed-Use Commercial Development," prepared by Overland Traffic Consultants Inc., September 2018, for 6000 Jefferson BH LLC (Traffic Study). This report analyzes the potential traffic and transportation impacts of the proposed project. This report is included as Appendix G of this Initial Study. On September 27, 2018, LADOT issued an inter-departmental memo for DOT Case No. CEN 18-46986 accepting the methodology and findings of the Traffic Study (included in Appendix G).

The scope of the Traffic Study was developed in consultation with LADOT and summarized in a Memorandum of Understanding (MOU) as required by LADOT "Transportation Impact Study Guidelines", December 2016 (included in Appendix G). As part of the MOU, screening criterion for the nearby Caltrans facilities were evaluated according to the requirements set forth in the Agreement between the City of Los Angeles and Caltrans District 7 (Freeway Impact Analysis Procedures, signed December 2015, Renewal).

Twelve (12) signalized intersections were selected by LADOT for the project's traffic impact analysis. These intersections are listed below, and also included in Figure 3 of Appendix G-1, Traffic Study, on page 12:

- La Cienega Boulevard and Fairfax Avenue
- La Cienega Boulevard and Jefferson Boulevard
- La Cienega Boulevard and Rodeo Road
- Jefferson Boulevard and National Boulevard
- Jefferson Boulevard and Rodeo Road/Higuera Street
- Jefferson Boulevard and Duquesne Avenue
- Jefferson Boulevard and Overland Avenue
- Culver Boulevard and Overland Avenue
- Culver Boulevard and Duquesne Avenue
- Culver Boulevard/Washington Boulevard and Watseka Avenue/Irving Place
- Washington Boulevard and National Boulevard
- National Boulevard and Venice Boulevard.

Project traffic impacts were analyzed for the weekday AM and PM peak-hour time periods at the study intersections. The Traffic Study provides two baseline scenarios to evaluate the project's traffic impacts: (1) existing traffic conditions plus the project traffic volume (Existing + Project) and (2) future 2020 cumulative traffic conditions plus the project traffic volume (Future + Project).

Traffic generating characteristics of many land uses have been surveyed by the Institute of Transportation Engineers (ITE). The results of the traffic generation studies have been published in a handbook titled Trip Generation, 10th Edition. Applying these ITE trip rates gives an estimate of the daily and peak hour traffic volume generated by the project. The traffic impact of the proposed development was calculated using the LADOT Critical Movement Analysis (CMA) method. The CMA analysis method quantifies the operating conditions of an intersection using a ratio of peak hour traffic volume to intersection capacity (V/C ratio).

Traffic impacts were identified if a proposed development would result in a significant change in traffic conditions at a study intersection. A significant impact would typically be identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts could also be significant if an intersection is already operating below an acceptable level of service, and project-related traffic would worsen conditions within the specified threshold range.

Although the project is entirely within the City of Los Angeles, several of the intersections evaluated are within the jurisdiction of Culver City. Therefore, the significant impact criterion for Culver City have been applied to those intersections. According to the standards adopted by Los Angeles and Culver City, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds as shown below:

City of Los Angeles Significant Impact Criteria

LOS	Final V/C Value	Increase in V/C Value
A or B	0.000 - 0.700	No Significant Impact
C	0.701 - 0.800	+ 0.040
D	0.801 - 0.900	+ 0.020
E & F	> 0.900	+ 0.010 or more

Culver City Significant Impact Criteria

LOS	Final V/C Value	Increase in V/C Value
A or B	0.000 - 0.700	No Significant Impact
C	0.701 - 0.800	+ 0.050
D	0.801 - 0.900	+ 0.040
E & F	> 0.900	+ 0.020 or more

Table T-1, Study Intersections - Existing Conditions summarizes the volume/capacity ratios and LOS values of existing conditions. As indicated by the data within this table, nine of the 12 intersections are currently operating at LOS D or better during the weekday AM peak and PM peak hours. The following intersections are operating at LOS E or F during the analyzed peak hours under the existing conditions:

- La Cienega Blvd/Jefferson Blvd – operating at LOS E during the PM peak hour;
- La Cienega Blvd/Rodeo Rd – operating at LOS F during the AM peak hour, and LOS F during the PM peak hour; and,
- Culver Blvd/Overland Ave – operating at LOS E during the AM peak hour, and LOS E during the PM peak hour.

Table T-1
Study Intersections – Existing Conditions

No	Intersection	AM Peak Hour		PM Peak Hour	
		CMA	LOS	CMA	LOS
1.	La Cienega Blvd. & Fairfax Ave.	0.839	D	0.521	A
2.	La Cienega Blvd. & Jefferson Blvd.	0.891	D	0.919	E
3.	La Cienega Blvd. & Rodeo Rd.	1.021	F	1.010	F
4.	Jefferson Blvd. & National Blvd.	0.877	D	0.425	A
5.	Jefferson Blvd. & Rodeo Rd /Higuera St.	0.763	C	0.716	C
6.	Jefferson Blvd. & Duquesne Ave.	0.666	B	0.692	B
7.	Jefferson Blvd. & Overland Ave.	0.754	C	0.799	C
8.	Culver Blvd & Overland Ave.	0.969	E	0.933	E
9.	Culver Blvd & Duquesne Ave.	0.664	B	0.638	B
10.	Culver Blvd. / Washington Blvd. & Watseka Ave. / Irving Pl.	0.784	C	0.824	D
11.	Washington Blvd. & National Blvd.	0.605	B	0.788	C
12.	National Blvd. & Venice Blvd.	0.579	A	0.798	C

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

As noted previously, the trip generation is based on the ITE Trip Generation handbook, 10th Edition. The studies indicate that the uses associated with the proposed project generate traffic volume as shown by the traffic rates in **Table T-2**, Project Trip Generation Rates.

Table T-2
Project Trip Generation Rates

ITE Code	Land Use Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
140	Manufacturing	3.93	77%	23%	0.62	31%	69%	0.67
150	Warehousing	1.74	77%	23%	0.17	27%	73%	0.19
937	Coffee Shop with Drive-thru	820.38	51%	49%	88.99	50%	50%	43.38
714	Corporate Office	7.95	95%	5%	0.72	3%	97%	0.6
Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018								

Applying these ITE trip rates gives an estimate of the daily and peak hour traffic volume generated by the project. **Table T-3**, Project Trip Generation, displays the estimated trip generation approved by LADOT staff for use in the Traffic Study. It is estimated that the project would generate 1,737 daily trips with 185 AM (134 in and 52 out) and 137 PM (34 in and 104 out) peak hour trips after adjusting the coffee shop trips for internal and pass - by traffic.

Table T-3
Project Trip Generation

ITE Code	PROJECT TRIPS Description	Size	Daily Traffic	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
140	Manufacturing	53,762 sf	211	25	8	33	11	25	36
150	Warehousing	50,775 sf	88	7	2	9	3	7	10
714	Corporate Office	90,054 sf	716	62	3	65	2	52	54
937	Coffee Shop	2,200 sf	1,805	100	96	196	48	47	95
	Coffee Internal Adjustment	20%	-361	-20	-19	-39	-10	-9	-19
	Coffee Pass-By Adjustment	50%	-722	-40	-38	-78	-19	-19	-38
	Total		1,737	134	52	186	35	103	138

Source: Overland Traffic Consultants, Inc. Traffic Study. September 2018.

Traffic volumes for existing conditions with the addition of project-generated traffic (the Existing + Project scenario) were derived by adding the net project trips to the existing traffic volumes. **Table T-4**, Study Intersections – Existing Conditions with Project Scenario summarizes the resulting V/C and LOS values at the study intersections for the existing conditions plus the project scenario.

Table T-4
Study Intersections – Existing Conditions with Project Scenario

No.	Intersection	Peak Hour	Existing CMA	Existing LOS	Existing + Project CMA	Existing + Project LOS	Existing + Project Impact	Significant Impact
1	La Cienega Boulevard and	AM	0.839	D	0.854	D	+ 0.015	NO
	Fairfax Avenue	PM	0.521	A	0.524	A	+ 0.003	NO
2	La Cienega Boulevard and	AM	0.891	D	0.896	D	+ 0.005	NO
	Jefferson Boulevard	PM	0.919	E	0.922	E	+ 0.003	NO
3	La Cienega Boulevard and	AM	1.021	F	1.036	F	+ 0.015	YES
	Rodeo Road	PM	1.010	F	1.015	F	+ 0.005	NO
4	Jefferson Boulevard and	AM	0.877	D	0.899	D	+ 0.022	YES
	National Boulevard	PM	0.425	A	0.440	A	+ 0.015	NO
5	Jefferson Boulevard and	AM	0.763	C	0.779	C	+ 0.016	NO
	Rodeo Road/Higuera Street	PM	0.716	C	0.729	C	+ 0.013	NO
6	Jefferson Boulevard and	AM	0.666	B	0.670	B	+ 0.004	NO
	Duquesne Avenue	PM	0.692	B	0.696	B	+ 0.004	NO
7	Jefferson Boulevard and	AM	0.754	C	0.769	C	+ 0.015	NO
	Overland Avenue	PM	0.799	C	0.803	D	+ 0.004	NO
8	Culver Boulevard and	AM	0.969	E	0.971	E	+ 0.002	NO
	Overland Avenue	PM	0.933	E	0.936	E	+ 0.003	NO
9	Culver Boulevard and	AM	0.664	B	0.670	B	+ 0.006	NO
	Duquesne Avenue	PM	0.638	B	0.644	B	+ 0.006	NO
10	Culver Bd. / Washington Bd. and	AM	0.784	C	0.787	C	+ 0.003	NO
	Watseka Ave. / Irving Pl.	PM	0.824	D	0.825	D	+ 0.001	NO
11	Washington Boulevard and	AM	0.605	B	0.614	B	+ 0.009	NO
	National Boulevard	PM	0.788	C	0.793	C	+ 0.005	NO
12	National Boulevard and	AM	0.579	A	0.587	A	+ 0.008	NO
	Venice Boulevard	PM	0.798	C	0.806	D	+ 0.008	NO

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Under the existing conditions with project scenario, nine of the 12 study intersections are projected to continue operating at LOS of D or better during the weekday AM and PM peak hours; there would be no new intersections operating at a LOS D or worse under the existing conditions with project scenario.

Under the existing conditions with project scenario, the following intersections would operate at a LOS E or F during the analyzed peak hours:

- La Cienega Blvd/Jefferson Blvd – operating at LOS E during the PM peak hour;
- La Cienega Blvd/Rodeo Rd – operating at LOS F during the AM peak hour, and LOS F during the PM peak hour; and,

- Culver Blvd/Overland Ave – operating at LOS E during the AM peak hour, and LOS E during the PM peak hour.

The proposed project is anticipated to have a significant impact at the La Cienega Blvd/Rodeo Rd intersection and at the Jefferson Blvd/National Blvd intersection under the existing conditions with project scenario as a result of potential impacts under the CMA methodology. Recommended mitigation measures are discussed below.

The future 2020 scenario (Future + Project) was analyzed by developing projections for future traffic conditions based on ambient growth and area/cumulative projects added. Future traffic volume projections were developed to analyze the traffic conditions after completion of other planned land developments ("related projects") including the proposed project. Pursuant to the LADOT traffic impact guidelines, the following steps were taken to develop the future traffic volume estimates:

- Existing traffic + ambient growth (1% per year)
- Traffic in (a) + related projects (without project scenario);
- Traffic in (b) with the proposed project traffic (with project scenario);
- Traffic in (c) + the proposed traffic mitigation, if necessary.

Table T-5 provides the description of the related projects used in this analysis. To evaluate future traffic conditions, estimates of the peak hour trips generated by the related projects were developed (**Table T-6**). The locations of forty-two (42) related projects used in this study are listed below. These are also listed on Figure 11 in Appendix G-1, Traffic Study on page 36.

Table T-5
Related Projects and Descriptions

No.	Project	Size		Location
1	Apartments	40	units	3833 S. Dunn Drive
2	Apartments	86	units	3822 S. Dunn Drive
3	Apartments	126	units	10601 Washington Boulevard (LA)
4	Apartments	1,218	units	3221 La Cienega Boulevard
5	Office	150,761	sf	5790 W. Jefferson Boulevard
6	Condominium	108	units	10375 Washington Boulevard
7	Office	64,000	sf	5950 W. Jefferson Boulevard
8	Private School (k-8)	75	students	8509 Higuera Street
9	Condominium	2 (net)	units	3837 Bentley Avenue
10	Condominium	2 (net)	units	4241 Bentley Avenue
11	Condominium	3 (net)	units	4034 La Salle Avenue
12	Condominium	2 (net)	units	3961 Tilden Avenue
13	Retail	1,250	sf	3030 La Cienega Boulevard
14	Retail/Restaurant	8,424	sf	10000 Washington Boulevard
15	Office R&D	62,558	sf	9919 Jefferson Boulevard
16	WLA Community College	18,904	students	Overland and Stocker
17	Convenience Market	2,285	sf	11224 Venice Boulevard
18	Condominium	2 (net)	units	3873 Bentley Avenue
19	Condominium	3 (net)	units	3832 Bentley Avenue
20	Office	74,600	sf	9300 Culver Boulevard
21	Single Family	8	du	3814 Lenawee Avenue
22	Office	128,000	sf	8777 Washington Boulevard
23	Single Family	10	du	4044 Globe Avenue
24	Condominium	3 (net)	units	4180 Duquesne Avenue
25	Apartments	15	units	3434 Wesley Avenue
26	Office	59,325	sf	8888 Washington Boulevard
27	Apartments	5 (net)	units	4227 Ince Boulevard
28	Office	3,246	sf	6066 Washington Boulevard
29	Automotive Repair	4	bays	2926 La Cienega Boulevard
30	Medical Office	38,172	sf	5645 Sepulveda Boulevard
31	Apartments	8	units	3727 Robertson Boulevard
32	Quality Restaurant	10,000	sf	8511 Warner Drive
	Retail	41,520	sf	

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Table T-5 Related Projects and Descriptions (continued)

No.	Project	Size		Location
33	Production Studio	413,127	sf	9336 Washington Boulevard
34	Office	55,477	sf	9735 Washington Boulevard
35	Condominium	3 (net)	units	4051 Jackson Avenue
36	Performance Theater	200	seat	9814 Washington Boulevard
37	Hotel	183	rooms	11469 Jefferson Boulevard
38	Private School	50	students	3939 Landmark Street
39	Apartments	199	units	8700 - 8750 Washington Boulevard
40	Apartments	141	units	3710 - 3750 Robertson Boulevard
41	Apartments	200	units	8824 National Boulevard
	Retail	24,000	sf	Ivy Station
	Office	201,000	sf	
	Hotel	148	rooms	
	Restaurant	20,000	sf	
42	Office	14,400	sf	6050 - 6056 Jefferson Boulevard

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Table T-6 Related Projects Trip Generation

		Daily	AM Peak Hour			PM Peak Hour		
No.	Location	Traffic	In	Out	Total	In	Out	Total
1	3833 S. Dunn Drive	266	4	16	20	16	9	25
2	3822 S. Dunn Drive	543	9	33	42	32	18	50
3	10601 Washington Boulevard (LA)	1,802	51	72	123	96	71	167
4	3221 La Cienega Boulevard	10,136	319	419	738	467	382	849
5	5790 W. Jefferson Boulevard	1,794	234	32	266	42	206	247
6	10375 Washington Boulevard	579	-3	35	32	31	11	42
7	5950 W. Jefferson Boulevard	716	65	13	78	23	58	81
8	8509 Higuera Street	308	37	31	68	9	11	20
9	3837 Bentley Avenue	12	0	1	1	1	0	1
10	4241 Bentley Avenue	12	0	1	1	1	0	1

Table T-6
Related Projects Trip Generation (continued)

No.	Location	Daily Traffic	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hours In	PM Peak Hours Out	PM Peak Hours Total
11	4034 La Salle Avenue	17	0	1	1	1	1	2
12	3961 Tilden Avenue	12	0	1	1	1	0	1
13	3030 La Cienega Boulevard	55	0	0	0	1	2	3
14	10000 Washington Boulevard	517	7	4	11	22	23	45
15	9919 Jefferson Boulevard	507	63	13	76	10	57	67
16	Overland and Stocker	12,115	778	81	859	535	238	773
17	11224 Venice Boulevard	1,686	30	30	60	24	23	47
18	3873 Bentley Avenue	12	0	1	1	1	0	1
19	3832 Bentley Avenue	17	0	1	1	1	1	2
20	9300 Culver Boulevard	3,702	124	31	155	167	188	355
21	3814 Lenawee Avenue	369	12	10	22	16	17	33
22	8777 Washington Boulevard	30	123	-3	120	-23	92	69
23	4044 Globe Avenue	95	2	6	8	6	4	10
24	4180 Duquesne Avenue	17	0	1	1	1	1	2
25	3434 Wesley Avenue	257	22	9	31	10	21	31
26	8888 Washington Boulevard	1,146	82	18	100	33	91	124
27	4227 Ince Boulevard	33	1	2	3	2	1	3
28	6066 Washington Boulevard	36	4	1	5	1	4	5
29	2926 La Cienega Boulevard	50	4	2	6	5	4	9
30	5645 Sepulveda Boulevard	1,535	75	20	95	45	106	151
31	3727 Robertson Boulevard	400	6	6	12	17	18	35
32	8511 Warner Drive	2,673	29	19	48	124	105	229
33	9336 Washington Boulevard	4,562	433	58	491	131	337	468
34	9735 Washington Boulevard	1,588	96	25	121	59	106	165
35	4051 Jackson Avenue	17	0	1	1	1	1	2
36	9814 Washington Boulevard	954	45	36	81	44	30	74
37	11469 Jefferson Boulevard	942	50	35	85	33	29	62
38	3939 Landmark Street	206	25	21	46	6	7	13
39	8700 - 8750 Washington Boulevard	2,721	55	91	146	141	111	252
40	3710 - 3750 Robertson Boulevard	1,980	2	65	67	105	62	167
41	8824 National Boulevard	4,124	173	83	256	127	174	301
42	6050 - 6056 Jefferson Boulevard	159	20	3	23	4	18	22

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Table T-7, **Study Intersections – Future Conditions without Project Scenario** summarizes the CMA method results and the intersection LOS at the study intersections for the future 2020 condition. This serves as the baseline for evaluating the potential impacts for the future 2020 conditions with the project.

Table T-7
Study Intersections – Future Conditions without Project Scenario

No.	Intersection	Peak Hour	Existing CMA	Existing LOS	Future (2020) Without Project CMA	Future (2020) Without Project LOS
1	La Cienega Boulevard and	AM	0.839	D	0.919	E
	Fairfax Avenue	PM	0.521	A	0.612	B
2	La Cienega Boulevard and	AM	0.891	D	1.091	F
	Jefferson Boulevard	PM	0.919	E	1.062	F
3	La Cienega Boulevard and	AM	1.021	F	1.126	F
	Rodeo Road	PM	1.010	F	1.101	F
4	Jefferson Boulevard and	AM	0.877	D	1.197	F
	National Boulevard	PM	0.425	A	0.776	C
5	Jefferson Boulevard and	AM	0.763	C	0.872	D
	Rodeo Road/Higuera Street	PM	0.716	C	0.842	D
6	Jefferson Boulevard and	AM	0.666	B	0.830	D
	Duquesne Avenue	PM	0.692	B	0.817	D
7	Jefferson Boulevard and	AM	0.754	C	0.872	D
	Overland Avenue	PM	0.799	C	0.884	D
8	Culver Boulevard and	AM	0.969	E	1.061	F
	Overland Avenue	PM	0.933	E	1.065	F
9	Culver Boulevard and	AM	0.664	B	0.772	C
	Duquesne Avenue	PM	0.638	B	0.746	C
10	Culver Bd. / Washington Bd. and	AM	0.784	C	0.886	D
	Watseka Ave. / Irving Pl.	PM	0.824	D	0.948	E
11	Washington Boulevard and	AM	0.605	B	0.835	D
	National Boulevard	PM	0.788	C	1.058	F
12	National Boulevard and	AM	0.579	A	0.752	C
	Venice Boulevard	PM	0.798	C	0.977	E

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Four of the 12 study intersections would be projected to operate at a LOS D or better under the future conditions without project scenario during the weekday AM and PM peak hours. Under this scenario, the following intersections would operate at a LOS E or LOS F:

- La Cienega Blvd/Fairfax Ave – projected to operate at LOS E during the AM peak hour.
- La Cienega Blvd/Jefferson Blvd – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.
- La Cienega Blvd/Rodeo Rd – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.
- Jefferson Blvd/National Blvd – projected to operate at LOS F during the AM peak hour.
- Culver Blvd/Overland Ave – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.
- Culver Blvd/Washington Blvd/Watseka Ave/Irving Pl – projected to operate at LOS E during the PM peak hour.
- Washington Blvd/National Blvd – projected to operate at LOS F during the PM peak hour.
- National Blvd/Venice Blvd – projected to operate at LOS E during the PM peak hour.

The future conditions with project scenario documents cumulative traffic conditions with the addition of project-generated traffic. Traffic volumes for these conditions were derived by adding the net project trips to the future conditions without project volumes.

Table T-8
Study Intersections – Future Conditions with Project Scenario

No.	Intersection	Peak Hour	Future (2020) Without Project CMA	LOS	Future (2020) With Project CMA	LOS	Impact	Significant Impact
1	La Cienega Boulevard and	AM	0.919	E	0.925	E	+ 0.006	NO
	Fairfax Avenue	PM	0.612	B	0.614	B	+ 0.002	NO
2	La Cienega Boulevard and	AM	1.091	F	1.097	F	+ 0.006	NO
	Jefferson Boulevard	PM	1.062	F	1.067	F	+ 0.005	NO
3	La Cienega Boulevard and	AM	1.126	F	1.141	F	+ 0.015	YES
	Rodeo Road	PM	1.101	F	1.107	F	+ 0.006	NO
4	Jefferson Boulevard and	AM	1.197	F	1.219	F	+ 0.022	YES
	National Boulevard	PM	0.776	C	0.795	C	+ 0.019	NO
5	Jefferson Boulevard and	AM	0.872	D	0.888	D	+ 0.016	NO
	Rodeo Road/Higuera Street	PM	0.842	D	0.855	D	+ 0.013	NO
6	Jefferson Boulevard and	AM	0.830	D	0.838	D	+ 0.008	NO
	Duquesne Avenue	PM	0.817	D	0.826	D	+ 0.009	NO
7	Jefferson Boulevard and	AM	0.872	D	0.886	D	+ 0.014	NO
	Overland Avenue	PM	0.884	D	0.888	D	+ 0.004	NO
8	Culver Boulevard and	AM	1.061	F	1.064	F	+ 0.003	NO
	Overland Avenue	PM	1.065	F	1.069	F	+ 0.004	NO
9	Culver Boulevard and	AM	0.772	C	0.778	C	+ 0.006	NO
	Duquesne Avenue	PM	0.746	C	0.752	C	+ 0.006	NO
10	Culver Bd. / Washington Bd. and	AM	0.886	D	0.887	D	+ 0.001	NO
	Watseka Ave. / Irving Pl.	PM	0.948	E	0.949	E	+ 0.001	NO
11	Washington Boulevard and	AM	0.835	D	0.844	D	+ 0.009	NO
	National Boulevard	PM	1.058	F	1.062	F	+ 0.004	NO
12	National Boulevard and	AM	0.752	C	0.759	C	+ 0.007	NO
	Venice Boulevard	PM	0.977	E	0.985	E	+ 0.008	NO

Source: Overland Traffic Consultants, Inc. Traffic Study. July 2018.

Four of the 12 study intersections would be projected to operate at a LOS D or better under the future conditions without project scenario during the weekday AM and PM peak hours. Under this scenario, the following intersections would operate at a LOS E or LOS F:

- La Cienega Blvd/Fairfax Ave – projected to operate at LOS E during the AM peak hour.
- La Cienega Blvd/Jefferson Blvd – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.
- La Cienega Blvd/Rodeo Rd – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.

- Jefferson Blvd/National Blvd – projected to operate at LOS F during the AM peak hour.
- Culver Blvd/Overland Ave – projected to operate at LOS F during the AM peak hour and LOS F during the PM peak hour.
- Culver Blvd/Washington Blvd/Watseka Ave/Irving Pl – projected to operate at LOS E during the PM peak hour.
- Washington Blvd/National Blvd – projected to operate at LOS F during the PM peak hour.
- National Blvd/Venice Blvd – projected to operate at LOS E during the PM peak hour.

The proposed project is anticipated to have a significant impact at the La Cienega Blvd/Rodeo Rd intersection and at the Jefferson Blvd/National Blvd intersection under the future conditions with project scenario as a result of potential impacts under the CMA methodology. Recommended mitigation measures are discussed below.

In order to mitigate potential impacts that would result under the analysis for both the existing conditions with project scenario and the future conditions with project scenario, the Project Applicant would implement a Transportation Mitigation Program, a series of mitigation measures including adoption of a Transportation Demand Management (TDM) program.

With the implementation of the Mitigation Measure **MM-TRA-1** identified below, the proposed project's potential impact upon transportation and traffic would be considered less than significant.

Mitigation Measure

MM-TRA-1 Implement a Transportation Mitigation Program, consisting of a series of actions to reduce vehicle trips to and from the project site. For more detail on each of these actions, refer to Appendix G-1, Traffic Study.

Transportation Demand Management (TDM). The specific purpose of the project's TDM program would be to maximize the people - moving capability by increasing the number of persons in a vehicle, or by influencing the time of, or need to travel by motorized vehicle. To accomplish these types of changes in travel behavior, the TDM program must rely on incentives or disincentives to make these shifts in behavior attractive to employees.

The goal of the project's TDM program would be to reduce the project's traffic by providing incentives to transit use, carpooling, vanpooling, ride –

hailing and ride / bike sharing programs through TDM elements developed for project employees.

A preliminary TDM program shall be prepared prior to the issuance of the building permits for the project with a final program prior to the issuance of the certificate of occupancy.

City Wide TDM Ordinance The project would be required to comply with LAMC 12.26 - J to provide and maintain minimal TDM measures. In addition, as recommended by LADOT the final TDM program would include: a statement of measurable goals to be achieved; an estimate of trips to be reduced; key elements of the program; a schedule with responsibilities for funding and implementation; a method for program monitoring performance; and development of a contingency plan.

Advance the Complete Streets Concept The concept of complete streets and its principles were advanced by California State Legislature by the adoption of the Complete Streets Act (AB 1358), which requires local jurisdictions to plan for a balanced and safe multimodal transportation network that meets the needs of all users of streets defined to include motorists, pedestrians and bicyclists.

The Project Applicant would assist the City in establishing bicycle improvements to complement the nearby Expo Rail Line, the existing Jefferson Boulevard bike lanes and Ballona Creek Bike Path through (1) contributions to the City's Bicycle trust fund, or (2) development of a Bike Share System as part of the Metro Phase III Bike Share System expansion project.

Financial Contribution – The Project Applicant could contribute a one-time fixed fee into the City's Bicycle Plan Trust fund to implement bicycle improvements within the area of the proposed project. Amount of fee to be determined in consultation with LADOT and Council District 10 staff.

Bike Share System - In May 2018, Metro Board approved the Phase III Bike Share expansion project which includes the project study area. Metro is currently seeking feedback as to locations to place Bike Share stations. The project site is a good location for a Bike Docking station because of its proximity to the Expo Rail Station, its adjacency to the Baldwin Hills Scenic Overlook State Park, the existing Jefferson bike lanes and Ballona Creek Bike Path.

The City of Los Angeles is responsible for a 50% match of the capital costs for the system which would equate to approximately $33,000 per

bike station with 10 bikes ($66,000 estimated cost per bike docking station). In- lieu of costly traffic signals or other similar vehicle enhancing infrastructure, the Project Applicant could participate in assisting the City by providing matching funds for a bike docking station.

Ride / Bike Sharing and Ride – Hailing Service – Promoting and subsidizing ride sharing, bike sharing and ride - hailing services could provide the highest level of connection and flexibility between the project and the Expo Rail Station. Availability of shared mobility around major transit stations can allow transit riders to realize the last - mile first - mile connections quickly. Emerging application of smartphone technology in transportation is ride sharing apps such as Lyft and Uber. These apps match up vetted drivers with riders in an ad-hoc taxi-like system. Uber and Lyft now both offer carpooling services as well, and therefore have entered the "ride-sharing" space. The significant traffic impact at Jefferson Boulevard and National Boulevard could be mitigated by reducing single auto trips between the Expo Station and the project site using this multi-modal approach.

Street Improvements – Street improvements are recommended at Rodeo Road at La Cienega Boulevard to address localized traffic congestion in the study area and the project's morning traffic impacts. The Project Applicant would design and implement a restriping and signal modification to convert the existing Rodeo Road westbound right - turn lane at La Cienega Boulevard into a westbound through / right - turn lane. Should this mitigation measure be deemed infeasible or unacceptable - it should be noted that no on- street parking would be removed for this modification, the City may substitute an alternative measure of equivalent effectiveness, such as TSM measures described below.

Transportation System Management (TSM) – Upgrade area-wide traffic signal equipment and hardware, e.g., newer Type 2070 traffic signal controllers for enhanced and real – time operation of the traffic signal timing, supplement vehicle detection with additional roadway system loops and closed - circuit television (CCTV) cameras; and lastly, upgrades to the ATSAC communications hub for the West Adams ATSAC system.

These TSM upgrades provide a system-wide benefit by reducing vehicle delays. If found necessary, the project applicant will meet with LADOT staff to define the signal system package of upgrades that will serve as an effective substitute measure, in lieu of roadway striping and signal modifications to Rodeo Road and La Cienega Boulevard.

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?

Less than Significant Impact. The congestion management program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010.

The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. 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 would 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 a.m. or p.m. weekday peak hours.

The nearest CMP monitoring intersection to the project site is located at La Cienega Boulevard and Jefferson Boulevard (CMP intersection 46) which is located approximately ¾ mile to the northeast. The project traffic added to La Cienega Boulevard and Jefferson Boulevard is estimated to be 78 morning and 68 afternoon peak hour trips. This volume of project traffic is above the CMP threshold of 50 peak hour trips and therefore, was analyzed in the Traffic Study (study intersection #2). As shown in **Table T-4, Study Intersections – Existing Conditions with Project Scenario**, the project-related impact at this CMP intersection is not considered significant.

The freeway monitoring stations are on Interstate-405, north of Venice Boulevard (CMP station 1070) and north of La Tijera Boulevard (CMP station 1069). The freeway monitoring station is on Interstate-10, east of Overland Avenue (CMP station 1011). The project does not exceed 150 peak hour trips on any freeway mainline segments.

Based on the project trip generation and the potential project-related impacts at CMP intersections, it is not expected that the new trips would conflict with the CMP or cause a significant impact.

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?

No Impact. As previously stated in **Section 8.e-f, Hazards and Hazardous Materials**, the nearest public airport is the Los Angeles International Airport, located approximately 3.7 miles west of the project site. There are no known private airports within the vicinity of the project site. The project site is not located within an airport land use plan area or within two miles of an airport; therefore, there is no change in air traffic patterns, including either an increase in traffic levels or a change in location would occur. No impact would occur.

d) 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. The proposed project would provide new driveways onto W Jefferson Boulevard and Bowcroft Street to provide access for visitors and employees at the project site. The design of the proposed project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. The final design of the proposed project, including curb cuts, ingress, egress, and other streetscape changes, would be subject to review by the LADBS, Public Works and the Department of Transportation and would be required to comply with all requirements of those agencies.

Impacts would be less than significant.

e) Result in inadequate emergency access?

Less Than Significant Impact. Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, in the Safety Element of the City's General Plan identifies nearby W Jefferson Boulevard as a 'Selected Disaster Route'. Neither the construction nor the operation of the proposed project would require or result in modifications to any of these identified roadways that would impact emergency traffic.

Construction of the proposed project could temporarily interfere with local and on-site emergency response. However, construction traffic management would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan, and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the proposed project would be confined to the site, except for utility improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

The Applicant would submit a parking and driveway plan for review by the LAFD, the BOE and the LADOT to ensure compliance with all applicable code-required site access

and circulation requirements, as well as code-required emergency access. The new driveways would be constructed in accordance with all applicable City BOE, and LAFD codes to allow for proper emergency vehicle ingress and egress. Impacts would be less than significant.

f) 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. In 2008, the California State Legislature adopted AB 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." In compliance with AB 1358, the City of Los Angeles adopted the Mobility Plan 2035 as an element of its General Plan in September 2016. The Mobility Plan 2035 identifies several areas in the project site vicinity on the enhanced network concept maps for transit (Map B), neighborhood circulation (Maps C1 and C3), bicycle lanes (Maps D1 and D2), and pedestrians (Map F). While none of these network/maps incorporate the project site specifically, the project site's proximity to facilities identified on these networks along with project features would reinforce these networks and concepts.

The project site is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) local lines (Lines 105 and 217) Metro rapid lines (Line 705), Culver CityBus (Lines 4 and 5), and Metro light rail (Expo Line Jefferson/La Cienega Station). The La Cienega/Jefferson station is approximately 0.8 miles to the northeast. The project would promote multimodal transportation, including bicycles, through the implementation of a TDM program including ample short and long term bicycle parking.

The proposed project requires a total of 20 short term bicycle parking spaces and 40 long term bicycle parking spaces. The short term bicycle parking spaces would be located along the Jefferson Boulevard frontage of Building A in the plaza area, and the long term bicycle storage area would be located on level P3 of the subterranean parking garage. The proposed project is also within walking distance to a variety of shops and services for visitors and employees along W Jefferson Boulevard and La Cienega Boulevard.

For these reasons, the proposed project is not anticipated to conflict with adopted policies, plans or programs of transportation facilities. Impacts would be less than significant.

17. TRIBAL CULTURAL RESOURCES.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

No Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[74] Section 5020.1 of the PRC defines a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

The project site is currently vacant and does not contain any site, building, or structure listed as a Los Angeles Historic-Cultural Monument (HCM).[75] The project site is not located in a City of Los Angeles Historic Preservation Overlay Zone, nor is it identified in Survey LA or Historic Places LA listings. The project site is not in the vicinity of any historic resources.

The California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the project site all with negative results. Thus 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. As such, the project would not be eligible for listing in any register for historical resources as defined in Public Resource Code section 5020.1(k). The proposed project would not have an impact on resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal notification and, when requested, consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in PRC Section 21074, as part of CEQA.

The geographic area of the project site is not known to contain any TCRs. As previously discussed under Section 5.b, the project site does not contain any known archaeological sites or archaeological survey areas. Nevertheless, the City will notify the Native

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74 California Public Resources Code Section 21084.1

75 City of Los Angeles. City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS). Accessed online July 2018 at: http://zimas.lacity.org/.

American tribes traditionally and culturally affiliated with the project area that have requested notification of projects within the City of Los Angeles, requesting that they respond within 30 days if they wish to open a formal consultation process with the City, and will consult with those tribes that request consultation.

With the implementation of the Regulatory Compliance Measure **RCM-TCR-1** identified below, the proposed project's potential impact upon TCRs would be considered less than significant.

Regulatory Compliance Measure:

RCM-TCR-1: The City will notify the Native American tribes traditionally and culturally affiliated with the project area that have requested notification of projects within the City of Los Angeles. The notifications will request that tribes respond within 30 days if they wish to open a formal consultation process with the City. The City will consult with those tribes, and consider measures to mitigate any impacts to resources determined to be TCRs.

18. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 storm water 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 resources, 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?	☐	☐	☒	☐

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. Wastewater generated in the City is treated at the Hyperion Treatment Plant in Playa del Rey. The Regional Water Quality Control Board (RWQCB) regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated by the proposed project. Operation of the proposed project could increase the amount of wastewater that would need to be treated at the Hyperion Treatment Plant.

Wastewater generated during operation of the proposed project could impact the capability of the Hyperion Treatment Plant to meet the RWQCB's discharge requirements. The wastewater reclamation plants that comprise the Hyperion Service Area have a total design capacity of 580 million gallons of wastewater per day (MGD). The City of Los Angeles Integrated Resources Plan indicates by the year 2020, projected wastewater flows will increase 16 percent to total approximately 531 MGD.[76]

Currently, the Hyperion Water Plant has a capacity of 450 MGD. On average, the Hyperion Water Plant receives a flow of 275 MGD, thus resulting in available capacity of 175 MGD.[77]

Table USS-1
Projected Wastewater Discharges for the Proposed Project

Land Use	Size (sf)	Generation Rates (GPD per 1,000 sf)	Total Wastewater Generation (GPD)
Restaurant/Retail	2,200	280	616
Corporate Office	90,054	150	13,508
Warehouse	50,775	20	1,014
Manufacturing	53,762	80	4,301
Balcony	13,052	0	0
Parking	8,935	20	179
Total			**19,618**

Source: City of Los Angeles. L.A. CEQA Thresholds Guide, Exhibit M.2-12, Sewage Generation Factors. 2006.
Note: Generation rate factors based on use classifications for "Coffee House: Pastry Baking Only", "Office Building", "Warehouse", "Food Processing Plant", and "Auto Parking".

The net increase in wastewater from the proposed project would be approximately 19,618 GPD; this would represent a minor fraction of the available capacity, and is not anticipated to significantly impact the Hyperion Water Plant. Therefore, the impact of the proposed project on wastewater treatment requirements would be less than significant.

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?

Less Than Significant Impact. The City of Los Angeles Department of Water and Power (LADWP) will provide water service to the project site. Water is conveyed to users in the project area along several circulating water mains of varying sizes. The proposed project would be required to connect to existing mains around the project area. As

76 *City of Los Angeles. Department of Public Works, Bureau of Sanitation, Integrated Resources Plan Executive Summary. 2006. Accessed July 2018 online at: https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf.*

77 *County of Los Angeles Department of Public Works, LA Sanitation website, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=hy5nte6s8_4&_afrLoop=30433509942992750#!, accessed July 15, 2015*

discussed above in Section 17(a), wastewater generated on the project site would be treated at the Hyperion Treatment Plant.

The LADWP Urban Water Management Plan provides historical and forecasted water demands for the City of Los Angeles. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economic activity. **Table USS-2**, **Historical Water Demand for LADWP's Service Area** shows the previous breakdown of average water use by from 2001.

Table USS-2
Historical Water Demand for LADWP's Service Area

Fiscal Year	Single Family	Multi-Family	Commercial	Industrial	Government	Non-Revenue	Total
2011-2014	209,651	165,364	98,994	17,663	42,543	32,774	566,990
2006-2010	236,154	180,277	106,964	23,196	42,956	30,617	620,165
2001-2005	239,754	190,646	109,685	21,931	41,888	52,724	656,628
1996-2000	222,748	191,819	111,051	23,560	39,421	33,696	622,295
1991-1995	197,322	177,104	110,724	21,313	38,426	39,364	584,253
24-Year Average	221,126	181,042	107,484	21,533	41,047	39,100	611,331

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-F

By analyzing historical demand, LADWP has forecasted water supply and demand projections in five year increments for each of the major categories of water uses. The point of forecasting water demand is to allow LADWP to better understand trends in water use, develop effective conservation programs, and invest appropriately in water supply development projects. The Urban Water Management Plan expects adequate water supplies would be able to their service area under normal, single-dry, and multi-dry year conditions through the year of 2035.

As shown in **Table USS-3**, **Project Estimated Water Demand**, at build out the proposed project would require approximately 23,542 gallons of water per day. The methodology to arrive at this amount is consistent with LADWP sewage generation rates established by the City of Los Angeles Bureau of Sanitation for expected wastewater demand, then extrapolating using guidance from the L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, in which water consumption is assumed to be 120 percent of wastewater generation.

Table USS-3
Project Estimated Water Demand

Land Use	Size (sf)	Generation Rates (GPD per 1,000 sf)	Total Water Consumption GPD)
Restaurant/Retail	2,200	336	739
Corporate Office	90,054	180	16,210
Warehouse	50,775	24	1,217
Manufacturing	53,762	96	5,161
Balcony	13,052	0	0
Parking	8,935	24	215
Total			**23,542**

Source: City of Los Angeles. L.A. CEQA Thresholds Guide, Exhibit M.2-12, Sewage Generation Factors. 2006.
Note: Generation rate factors based on use classifications for "Coffee House: Pastry Baking Only", "Office Building", "Warehouse", "Food Processing Plant", and "Auto Parking".

Based on the 2015 UWMP water demand projections through 2040, projected water demand for the City would be met with adequate supply under average weather conditions through the year of 2040 and intervening years (i.e., when the proposed project would be completed). The proposed project would result in an estimated net increase in water demand of approximately 26 acre-feet per year, which would comprise a very small fraction of the City's water demand.

The proposed project would not significantly affect existing on-site water and wastewater lines and/or off-site wastewater and water facilities. Implementation of the current requirements of CALGreen and the LA Green Building Code would further reduce water use and wastewater generation. Therefore, the proposed project would have a less than significant impact on water and wastewater treatment facilities.

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?

Less Than Significant Impact. As described in **Section 9.e**, the proposed project would result in an increase in impervious surface on the project site and would cause changes to site stormwater runoff and local drainage patterns. Approximately 50 percent of the project site is currently impervious surface; this would be increased to accommodate the two buildings, surface parking lot, and plaza and garden areas.

Runoff from the project site would be collected on the site and directed towards existing storm drains in the vicinity. Furthermore, the proposed project would provide appropriate on-site drainage improvements to control runoff, such as catch basins, plant drains, or roof downspouts to collect roof and site runoff and direct stormwater away from the structures through a series of underground storm drain pipes.

As there are no known deficiencies in the existing storm drain system, the proposed project would result in a less than significant impact. Further, final plan check by the Los Angeles Bureau of Sanitation (BOS) would ensure that adequate capacity is available in the storm drain system in the surrounding streets prior to final project approval. The proposed project would include any necessary improvements to the storm drain infrastructure to serve the project site, as well as any extensions to the existing system in the area. Therefore, impacts related to the capacity of the storm drain system would be less than significant. Thus, the project would not require the construction of new off-site stormwater drainage facilities or expansion of existing facilities.

During the project's construction phase, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared for the proposed project in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles BOE for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to stormwater discharge would be less than significant.

The proposed project would include appropriate stormwater pollution control measures into the design according to the City's Low Impact Development (LID) Ordinance to control stormwater during the project's operational phase. These measures would be reviewed by the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for approval. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational stormwater discharges would be less than significant.

d) Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. Water supply to the project site is provided by the LADWP. Build out of the proposed project would create an increase in demand for water supplies compared to existing conditions on the project site. As discussed in **Section 18.b**, there would be sufficient capacity in water supply to be able to accommodate the proposed project without new or expanded entitlements. Impacts would be less than significant.

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?

Less Than Significant Impact. See responses to **Sections 18.a** and **18.b**, above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact.

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the L.A. CEQA Thresholds Guide, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the Storm Water Management Program Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City.

Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to

reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030. State law (AB 341) currently requires at least 50 Percent solid waste diversion and establishes a state-wide goal of not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[78]

Moreover, State law requires mandatory commercial recycling in all businesses and multi-family complexes, and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multifamily solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Both the Sunshine Canyon Landfill and the Chiquita Canyon Landfill accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, and has a remaining capacity of 72.6 million tons and an estimated remaining life of 22 years. An expansion of the Chiquita Canyon Landfill was recently approved by the Los Angeles County Board of Supervisors which will boost the daily disposal tonnage from 6,000 to 12,000 tons, the weekly disposal tonnage from 30,000 to 60,000 tons and the maximum amount of tonnage from 23 million to 60 million tons, extending the estimated remaining life of the landfill to 30 years.[79]

The proposed project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the project site would be recycled/recovered and would not be deposited in area landfills.

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78 *City of Los Angeles. Bureau of Sanitation, Zero Waste Progress Report. 2013. Accessed July 2018 online at: https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf.*

79 *Waste 360. "Waste Connections' Chiquita Canyon Landfill Battle Explained". April 2017. Accessed July 2018 online at: http://www.waste360.com/design-and-construction/waste-connections-chiquita-canyon-landfill-battle-explained.*

As summarized in **Table USS-4**, below, it is estimated that approximately 434 tons of solid waste would be generated by the proposed project's construction activities. This represents a tiny fraction of the Sunshine Canyon Landfill's existing remaining disposal capacity of 72.6 million tons. Moreover, as of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling. Thus, only a fraction of the construction and demolition debris would end up in regional landfills.

Table USS-4
Estimated Construction Solid Waste Generation

Land Use	Size (sf)	Generation Rates (pounds of waste per sf)	Total Waste Generation (tons)
Non-residential	207,043	4.02	416
Parking	8,935	4.02	18
Total			**434**

Source: Impact Sciences, 2018.
Note: Generation rate factors based on US EPA, "Characterization of Building-Related Construction and Demolition Debris in the United States", Table A-4. June 2998.

At build out, the proposed project would generate approximately 9,055 pounds of waste per day or approximately 1,654 tons of solid waste per year as shown in **Table USS-5, Projected Daily Solid Waste Generation.** According to the 2016 Los Angeles County Integrated Waste Management Plan (IWMP), the total remaining capacity of the landfills is approximately 114 million tons.[80] The 1,654 tons per year generated during operation of the proposed project (not including diversion rates) would represent a negligible percentage of the remaining capacity at the landfills which currently accept solid waste from the city. Therefore, the uses associated with the proposed project would not result in a significant impact towards landfill capacity. Impacts would be less than significant.

80 *County of Los Angeles, Department of Public Works. Los Angeles County Wide Integrated Waste Management Plan. 2016 Annual Report. Accessed online July 2018 at: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.*

Table USS-5
Projected Daily Solid Waste Generation

Land Use	Size (sf)	Generation Rates (pounds of waste per day)	Total Waste Generation (pounds of waste per day)	Total Waste Generation (tons per year)
Restaurant/Retail	2,200	2.5 per 1,000 sf	6	1
Corporate Office	90,054	0.084 per 1 sf	7,565	1,382
Warehouse	50,775	1.42 per 100 sf	721	132
Manufacturing	53,762	1.42 per 100 sf	763	139
Balcony	13,052	0	0	0
Parking	8,935	0	0	0
Total			**9,055**	**1,654**

Source: Impact Sciences, 2018.
Note: Generation rate factors based on CalRecycle Estimated Solid Waste Generation Rates. Accessed July 2018 online at: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.
Note: Generation rate factors based on use classifications for "Commercial Retail", "Professional Office", and "Manufacturing/Warehouse".

g) 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 California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50 percent by the year 2000 and a statewide goal of 75 percent by 2020. In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70 percent of the solid waste generated in the City by 2013, diverting 90 percent by 2025, and becoming a zero waste city by 2030. As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[81]

The proposed project would be required to comply with all applicable regulations regarding solid waste disposal. The proposed project's potential impacts associated with federal, state, and local statutes and regulations related to solid waste would be less than significant.

81 *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

19. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to 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?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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 with Mitigation Incorporated. As discussed in **Section 4, Biological Resources,** the project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the project site and the surrounding area, construction and operation of the proposed project would not impact the habitat or population of the project site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources**, potential impacts related historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance and mitigation measures.

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

Less Than Significant with Mitigation Incorporated. The potential for cumulative impacts occurs when the independent impacts of the project are combined with impacts from other development to result in impacts that are greater than the impacts of the project alone. Located within the vicinity of the project site are other past, current, and reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential cumulative impacts. However, based on the proceeding discussions, no unmitigatable significant impacts were identified for the environmental resources identified in this Initial Study. As the proposed project would not result in any unmitigated significant impacts, there would be no cumulative impacts.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. As identified throughout the analysis, the proposed project would have no unmitigatable significant impacts that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant.

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