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

PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	CD 11 - MIKE BONIN
PROJECT TITLE	**CASE NO.**
ENV-2012-3536-MND-REC	DIR-2012-3537-DB-SPR-MEL, ZA-2014-2220-CDP, TT-70786

PROJECT LOCATION
138 E CULVER BLVD

PROJECT DESCRIPTION
The project site consists of eight parcels that will be combined; reversion to acreage by Tract Map No. TT-70786. The subject property is approximately 38,743 square feet and incudes the development of a new, 87,294-square-foot mixed-use building consisting of three levels of residential uses over groundfloor commercial uses and parking, and two levels of subterranean parking; the project is subject to a maximum height of 56 feet. The project will provide 72 dwelling units, of which eight are very-low income units, and 218 parking spaces. The total project floor area consists of: 62,588 square feet of residential floor area; 14,500 square feet of commercial floor area consisting of 13,000 square feet of retail space and 1,500 square feet of restaurant space; and 10,206 square feet of common areas integrated into all four levels of the building. The proposed development is within the Westchester-Playa Del Rey Community Plan Area, is zoned [Q]C4-1VL, and has a General Plan Land Use Designation of General Commercial. The property is also located within the Los Angeles Coastal Transportation Corridor Specific Plan and the Coastal Zone boundary. The project includes the export of 29,700 cubic yards of dirt.

The requested entitlements include a Density Bonus, Site Plan Review, Coastal Development Permit, and a Mello Act Determination for a project that will create 10 or more dwelling units. In consideration of providing eight affordable units for very low income households, the applicant seeks the following incentives: an increase in floor area ratio from 1.5:1 to 3:1 and an increase in height from 45 feet and three stories to 56 feet and four stories. Pursuant to LAMC Section 12.22 A.25, no additional height is permitted for those portions of the project within 50 feet of the adjacent R-1 zone.

Attached to this Mitigated Negative Declaration is an Initial Study prepared by CAJA Environmental Services for the Applicant. The Initial Study is referenced in this document as well as the additional studies, which are included as Appendices in the environmental file.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Legado Del Mar, LLC
270 North Cannon Drive, 2nd Floor
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**
JULIET OH	Planning Assistant	(213) 978-1186

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		SEPTEMBER 15, 2014

I-10. Aesthetics (Landscape Plan)

- Environmental impacts to the character and aesthetics of the neighborhood may result from project implementation. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D) and to the satisfaction of the decision maker.

I-120. Aesthetics (Light)

- Environmental impacts to the adjacent residential properties may result due to excessive illumination on the project site. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.
- All outdoor lighting shall be directed downward and shall be shielded.

I-130. Aesthetics (Glare)

- Environmental impacts to adjacent residential properties may result from glare from the proposed project. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

III-10. Air Pollution (Demolition, Grading, and Construction Activities)

-
- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.
- Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes.
- Ground cover in disturbed areas shall be replaced as quickly as possible.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.
- Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications.
- All diesel-powered construction equipment shall meet USEPA Tier 3 or higher emissions standards according to the following: o January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.
- All diesel-powered construction equipment shall use CARB Level 3 or higher diesel particulate filters with oxidation catalysts that reduce emissions by 20 percent or more.
- All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

V-20. Cultural Resources (Archaeological)

- Environmental impacts may result from project implementation due to discovery of unrecorded archaeological resources. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- If any archaeological materials are encountered during the course of project development, all further development activity shall halt and:
- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

V-30. Cultural Resources (Paleontological)

- Environmental impacts may result from project implementation due to discovery of unrecorded paleontological resources. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- If any paleontological materials are encountered during the course of project development, all further development activities shall halt and:
- a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- b. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

V-40. Cultural Resources (Human Remains)

- Environmental impacts may result from project implementation due to discovery of unrecorded human remains.
- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
- a. Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033. 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
- c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;

- f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.
- *Discuss and confer* means the meaningful and timely discussion careful consideration of the views of each party.

VI-10. Seismic

- Environmental impacts to the safety of future occupants may result due to the project's location in an area of potential seismic activity. However, this potential impact will be mitigated to a less than significant level by the following measure:
- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

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

- Short-term erosion impacts may result from the construction of the proposed project. However, these impacts can be mitigated to a less than significant level by the following measures:
- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
- a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

VI-50. Geotechnical Report

-
- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
- The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

VI-70. Liquefaction Area

- Environmental impacts may result due to the proposed project's location in an area with liquefaction potential. However, these potential impacts will be mitigated to a less than significant level by the following measures:
- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The project shall comply with the Uniform Building Code Chapter 18. Division1 Section1804.5 Liquefaction Potential and Soil Strength Loss. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
- The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

VII-10. Green House Gas Emissions

- The project will result in impacts resulting in increased green house gas emissions. However, the impact can be reduced to a less than significant level though compliance with the following measure(s):
- Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the project.

VIII-20. Explosion/Release (Methane Gas)

- Environmental impacts may result from project implementation due to its location in an area of potential methane gas zone. However, this potential impact will be mitigated to a less than significant level by the following measures:
- All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.
- All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.
- All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.
- Since the Project would include residential uses or other purposes involving sensitive receptors, radon testing shall be conducted to ensure that elevated radon levels are not present at the Site.
- Any oil wells encountered shall to be properly abandoned in accordance with the current requirements of the California Division of Oil, Gas and Geothermal Resources.

IX-10. Groundwater Quantity (Dewatering System)

- Environmental impacts to groundwater quantity may result from implementation of the proposed project through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capacity. The Department of Building and Safety requires, when feasible, that applicants modify the structural design of a building so as not to need a permanent dewatering system. When a permanent dewatering system is necessary, the Department of Building and Safety require the following measures to mitigate the impacts to a less than significant level:
- Prior to the issuance of any permit for excavation, the applicant shall, in consultation with the Department of Building and Safety, submit a Dewatering Plan to the decision-maker for review and approval. Such plan shall indicate estimates for how much water is anticipated to be pumped and how the extracted water will be utilized and/or disposed of.
- Extracted groundwater shall be pumped to a beneficial on-site use such as, but not limited to: 1) landscape irrigation; 2) decorative fountains or lakes; 3) toilet flushing; or 4) cooling towers.
- Return water to the groundwater basin by an injection well.

IX-20. Stormwater Pollution (Demolition, Grading, and Construction Activities)

-
- Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

IX-120. Flooding/Tidal Waves

- Environmental impacts may result due to the location of the proposed project in an area which is potentially subject to flood hazards. However, any flood hazard that exists will be mitigated to a less than significant level by the following measure:
- The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

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

-

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Construction staging areas shall be as far from sensitive receptors as possible, particularly the apartments to the south of Trolley Place.
- Temporary sound barriers, capable of achieving a sound attenuation of at least 20 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding off-site residential, school, and church uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.
- Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.
- Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets.
- A noise disturbance coordinator shall be established to respond to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.
- All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

XII-40. Increased Noise Levels (Parking Structure Ramps)

- Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

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

- Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:
- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

XII-170. Severe Noise Levels (Residential Fronting on Major or Secondary Highway, or adjacent to a Freeway)

- Environmental impacts to future occupants may result from this project's implementation due to mobile noise. However, these impacts will be mitigated to a less than significant level by the following measures:
- All exterior windows having a line of sight of a Major or Secondary Highway shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Coefficient (STC) value of 50, as determined in accordance with ASTM E90 and ASTM E413, or any amendment thereto.

- The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

XII-230. Increased Noise Levels

- Environmental impacts to the adjacent residential properties may result due to noise generated on the site. However, this potential impact will be mitigated to a less than significant level by the following measure:
- The Proposed Project shall include double-paned windows on all of the exterior windows for each residential unit.
- All HVAC equipment shall be mounted on the roof of the Proposed Project instead of the ground level.
- The Proposed Project shall utilize central air conditioning and heating in each new residential unit.
- The Proposed Project shall include vegetation sound walls for any ground floor residential units (e.g., planting vegetation on the exterior of ground floor units to create a natural sound barrier).
- Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.
- Construction haul trucks shall avoid driving over potholes and dips when arriving at or leaving the project site.
- The construction contractor shall stage and warm-up construction equipment as far from nearby sensitive receptors as possible.
- Construction staging areas shall be as far from sensitive receptors as possible, particularly the apartments to the south of Trolley Place.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding off-site residential, school, and church uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.
- Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.
- A noise disturbance coordinator shall be established to respond to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.
- All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.
- The noise disturbance coordinator shall be responsible for receiving local complaints about construction vibration. The noise disturbance coordinator shall determine the cause of the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices the are sent to the residential units within 500 feet of the construction site and all signs legible at a distance of 50 feet, at the construction site shall list the telephone number for the noise disturbance coordinator.

XIV-10. Public Services (Fire)

- Environmental impacts may result from project implementation due to the location of the project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:
- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

XIV-20. Public Services (Police – Demolition/Construction Sites)

-
- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

XIV-30. Public Services (Police)

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

XIV-60. Public Services (Schools)

- Environmental impacts may result from project implementation due to the location of the project in an area with insufficient school capacity. However, the potential impact will be mitigated to a less than significant level by the following measure:
- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

XIV-70. Public Services (Street Improvements Not Required By DOT)

- Environmental impacts may result from project implementation due to the deterioration of street quality from increased traffic generation. However, the potential impact will be mitigated to a less than significant level by the following measure:
- The project shall comply with the Bureau of Engineering's requirements for street dedications and improvements that will reduce traffic impacts in direct portion to those caused by the proposed project's implementation.

XIV-80. Construction Damage Bond

-
- A cash bond or security ("Bond") shall be posted in accordance with terms, specifications, and conditions to the satisfaction of the Bureau of Engineering and shall remain in full force and effect to guarantee that any damage incurred to the roadway adjacent to the property, which may result from any construction activity on the site, is properly repaired by the applicant.
- Prior to the issuance of a Certificate of Occupancy, any damage incurred to the roadway adjacent to the property, which may result from any construction activity on the site, shall be properly repaired by the applicant to the satisfaction of the Bureau of Engineering. The applicant is hereby advised to obtain all necessary permits to facilitate this construction/repair.

XV-10. Recreation (Increased Demand For Parks Or Recreational Facilities)

- Environmental impacts may result from project implementation due to insufficient parks and/or recreational facilities. However, the potential impact will be mitigated to a less than significant level by the following measure:
- **(Apartments)** Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

XVI-10. Increased Vehicle Trips/Congestion

- An adverse impact may result from the project's traffic generation. An investigation and analysis conducted by the Department of Transportation has identified significant project-related traffic impacts which can be mitigated to less than significant level by the following measure:
- Implementing measures detailed in said Department's communication to the Planning Department dated November 15, 2013 and attached shall be complied with. Such report and mitigation measures are incorporated herein by reference.
- F. Site Access and Internal Circulation This determination does not include approval of the project's driveways, internal circulation and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles 90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

- A. Application Fee Pursuant to Section 5.C of the CTCSP, the applicant submitted a payment of $6,124.55 for the application/traffic study review fee on July 18, 2011.
- B. Covenant and Agreement Pursuant to Section 5.B of the CTCSP, the owner(s) of the property must sign and record a Covenant and Agreement prior to issuance of any building permit, acknowledging the contents and limitations of this Specific Plan in a form designed to run with the land.
- C. Highway Dedication and Physical Street Improvements Pursuant to Section 5.D.2 of the CTCSP, and in order to mitigate potential access and circulation impacts, the applicant may be required to make highway dedications and improvements to comply with the following street standards: 1. Vista Del Mar is designated as a Scenic Major Highway, Class II in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross section for this road classification is a 40-foot half roadway within a 52-foot half right-of-way. The Project will be required to provide a variable-width dedication to complete a 52-foot half right-of-way along the entire Vista Del Mar frontage of the Project site, and street improvements must be provided in order to complete a 40-ft half roadway width along with a 12-foot wide concrete sidewalk within the new right-of-way limit along this frontage. 2. Culver Boulevard is designated as a Local Street (in a commercial and multiple residential area) in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross section for a Local Street is a 20-ft half roadway within a 30-foot half right-of-way. This segment of Culver Boulevard currently consists of a 30-foot half roadway within a 40-foot half right-of-way. The Project is requesting a 10-foot wide right-of-way vacation along Culver Boulevard. Since this segment of Culver Boulevard segment will conform to the Local Street Standards even with the requested merger area, DOT has no objection to the requested street vacation. However, the Project will be required to reconstruct the half roadway of Culver Boulevard adjacent to the Project site to the standard 20-foot width, and construct a new 10-foot wide concrete sidewalk within the new right-of-way limit along this frontage. 3. Trolley Place (aka, Pacific Avenue) is designated as a Local Street (in a commercial and multiple residential area)
- E. Construction Impacts DOT recommends that a construction worksite traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.

XVII-10. Utilities (Local Water Supplies - Landscaping)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Minimum irrigation system distribution uniformity of 75 percent
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.

XVII-20. Utilities (Local Water Supplies - All New Construction)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-30. Utilities (Local Water Supplies - New Commercial or Industrial)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- All restroom faucets shall be of a self-closing design.

XVII-40. Utilities (Local Water Supplies - New Residential)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

XVII-60. Utilities (Local Water Supplies - Restaurant, Bar, or Nightclub)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- Install/retrofit high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install/retrofit restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Install/retrofit and utilize only restroom faucets of a self-closing design.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-80. Utilities (Water Treatment or Distribution)

- Environmental impacts may result from project implementation due to the creation of additional demand for local or regional water treatment or distribution facilities. However, the potential impacts can be mitigated to a less than significant level by the following measures:
- The project shall include a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak hours.
- A grey water system to reuse wastewater from the project.
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and
- New wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.

XVII-90. Utilities (Solid Waste Recycling)

- Environmental impacts may result from project implementation due to the creation of additional solid waste. However, this potential impact will be mitigated to a less than significant level by the following measure:

- **(Operational)** Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- **(Construction/Demolition)** Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- **(Construction/Demolition)** To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

XVII-100. Utilities (Solid Waste Disposal)

-
- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

XVIII-10. Cumulative Impacts

- There may be environmental impacts which are individually limited, but significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. However, these cumulative impacts will be mitigated to a less than significant level though compliance with the above mitigation measures.

XVIII-20. Effects On Human Beings

- The project has potential environmental effects which cause substantial adverse effects on human beings, either directly or indirectly. However, these potential impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

XVIII-30. End

- The conditions outlined in this proposed mitigated negative declaration which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on the face page of this document. Therefore, it is concluded that no significant impacts are apparent which might result from this project's implementation.

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
and CHECKLIST

(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 11 - MIKE BONIN	**DATE:**
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2012-3536-MND-REC	**RELATED CASES:** DIR-2012-3537-DB-SPR-MEL, ZA-2014-2220-CDP, TT-70786	
PREVIOUS ACTIONS CASE NO.:	☐ Does have significant changes from previous actions. ☐ Does NOT have significant changes from previous actions	

PROJECT DESCRIPTION:
DEMOLITION OF A 1 STORY 1,000 SF COMMERCIAL BUILDING AND CONSTRUCTION OF A 4-STORY MIXED-USE PROJECT WITH 72 DWELLING UNITS AND 13,000 SF OF RETAIL AREA AND 1,500 SF OF RESTAURANT SPACE

ENV PROJECT DESCRIPTION:
The project site consists of eight parcels that will be combined; reversion to acreage by Tract Map No. TT-70786. The subject property is approximately 38,743 square feet and incudes the development of a new, 87,294-square-foot mixed-use building consisting of three levels of residential uses over groundfloor commercial uses and parking, and two levels of subterranean parking; the project is subject to a maximum height of 56 feet. The project will provide 72 dwelling units, of which eight are very-low income units, and 218 parking spaces. The total project floor area consists of: 62,588 square feet of residential floor area; 14,500 square feet of commercial floor area consisting of 13,000 square feet of retail space and 1,500 square feet of restaurant space; and 10,206 square feet of common areas integrated into all four levels of the building. The proposed development is within the Westchester-Playa Del Rey Community Plan Area, is zoned [Q]C4-1VL, and has a General Plan Land Use Designation of General Commercial. The property is also located within the Los Angeles Coastal Transportation Corridor Specific Plan and the Coastal Zone boundary. The project includes the export of 29,700 cubic yards of dirt.

The requested entitlements include a Density Bonus, Site Plan Review, Coastal Development Permit, and a Mello Act Determination for a project that will create 10 or more dwelling units. In consideration of providing eight affordable units for very low income households, the applicant seeks the following incentives: an increase in floor area ratio from 1.5:1 to 3:1 and an increase in height from 45 feet and three stories to 56 feet and four stories. Pursuant to LAMC Section 12.22 A.25, no additional height is permitted for those portions of the project within 50 feet of the adjacent R-1 zone.

Attached to this Mitigated Negative Declaration is an Initial Study prepared by CAJA Environmental Services for the Applicant. The Initial Study is referenced in this document as well as the additional studies, which are included as Appendices in the environmental file.

ENVIRONMENTAL SETTINGS:
The subject site is comprised of eight parcels, forming an irregularly shaped triangular lot that is approximately 38,743 square feet. The parcel has a frontage of roughly 400 feet on Culver Boulevard with a width of 125 feet on Trolley Place. The property fronts Culver Boulevard a Local Street to the northwest, Vista Del Mar a Scenic Major Class II Highway to the east, and Trolley Place (Pacific Avenue) a Local Street to the west and south. Although Trolley Place is currently maintained as a Local Street, it includes two lots that are zoned [Q]C4-1VL and R1-1. An alley, Oceanview Lane, runs along the eastern edge of the property and through the southeast tip of the parcel.

The areas immediately surrounding the project site to the south and west are developed primarily with single and multi-family residential uses in the R1-1 and R3-1 zones, respectively. The properties north and west of the site, on Culver Boulevard and Vista Del Mar consist of a retail and restaurant uses in the [Q]C4-1VL zone.

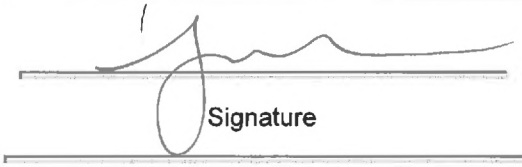
The site is located in the Playa Del Rey community of the City of Los Angeles and is within the dual coastal zone jurisdiction due to project site proximity to the Pacific Ocean; it is also located within the Del Rey Lagoon Specific Plan and the Coastal Transportation Corridor Specific Plan. The project site is also located less than one mile northwest from the Los Angeles International Airport and is

immediately south of the Ballona Creek Channel. The property is located within a Methane Zone, Liquefaction Zone, and Tsunami Inundation Zone		
PROJECT LOCATION: 138 E CULVER BLVD		
COMMUNITY PLAN AREA: WESTCHESTER - PLAYA DEL REY **STATUS:** ✔ Does Conform to Plan ☐ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** WEST LOS ANGELES	**CERTIFIED NEIGHBORHOOD COUNCIL:** WESTCHESTER - PLAYA DEL REY
EXISTING ZONING: [Q]C4-1VL	**MAX. DENSITY/INTENSITY ALLOWED BY ZONING:** 1/400 sq.ft; 1.5:1 FAR	
GENERAL PLAN LAND USE: GENERAL COMMERCIAL	**MAX. DENSITY/INTENSITY ALLOWED BY PLAN DESIGNATION:** 1/400 sq.ft; 1.5:1 FAR	**LA River Adjacent:** NO
	PROPOSED PROJECT DENSITY: 72 du; 3:1 FAR	

Determination (To Be Completed By Lead Agency)

On the basis of this initial evaluation:

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

	**Planning Assistant**	**(213) 978-1186**
Signature	Title	Phone

Evaluation Of Environmental Impacts:

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

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	✓ GREEN HOUSE GAS EMISSIONS	☐ POPULATION AND HOUSING
☐ AGRICULTURE AND FOREST RESOURCES	✓ HAZARDS AND HAZARDOUS MATERIALS	✓ PUBLIC SERVICES
✓ AIR QUALITY	✓ HYDROLOGY AND WATER QUALITY	✓ RECREATION
☐ BIOLOGICAL RESOURCES	☐ LAND USE AND PLANNING	✓ TRANSPORTATION/TRAFFIC
✓ CULTURAL RESOURCES	☐ MINERAL RESOURCES	✓ UTILITIES AND SERVICE SYSTEMS
✓ GEOLOGY AND SOILS	✓ NOISE	✓ MANDATORY FINDINGS OF SIGNIFICANCE

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

Background

PROPONENT NAME:
Legado Del Mar, LLC

PHONE NUMBER:
(310) 432-0800

APPLICANT ADDRESS:
270 North Cannon Drive, 2nd Floor
Beverly Hills, CA 90210

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
04/01/2014

PROPOSAL NAME (if Applicable):

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
I. AESTHETICS					
a.	Have a substantial adverse effect on a scenic vista?			✓	
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings 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?		✓		
II. AGRICULTURE AND FOREST RESOURCES					
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 nonagricultural 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?				✓
III. AIR QUALITY					
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?				✓
IV. BIOLOGICAL RESOURCES					
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?				✓
V. CULTURAL RESOURCES					

		Potentially significant impact	Potentially significant unless 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 formal cemeteries?		✓		
VI. GEOLOGY AND SOILS					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			✓	
b.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?		✓		
c.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?		✓		
d.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?			✓	
e.	Result in substantial soil erosion or the loss of topsoil?		✓		
f.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
g.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				✓
h.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
VII. GREEN HOUSE GAS EMISSIONS					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		✓		
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	
VIII. HAZARDS AND HAZARDOUS MATERIALS					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for 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?			✓	

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
IX. HYDROLOGY AND WATER QUALITY					
a.	Violate any water quality standards or waste discharge requirements?			✓	
b.	Substantially deplete groundwater supplies or interfere 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 preexisting 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?		✓		
X. LAND USE AND PLANNING					
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?				✓
XI. MINERAL RESOURCES					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓
XII. NOISE					
a.	Exposure of persons to or generation of noise 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?		✓		

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				✓
XIII. POPULATION AND HOUSING					
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓
XIV. PUBLIC SERVICES					
a.	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: Fire protection?		✓		
b.	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: Police protection?		✓		
c.	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: Schools?		✓		
d.	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: Parks?		✓		
e.	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: Other public facilites?		✓		
XV. RECREATION					
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?		✓		
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			✓	
XVI. TRANSPORTATION/TRAFFIC					
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?		✓		

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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 supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✓
XVII. UTILITIES AND SERVICE SYSTEMS					
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?		✓		
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			✓	
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?		✓		

Note: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

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

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

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2012-3536-MND-REC** and the associated case(s), **DIR-2012-3537-DB-SPR-MEL, ZA-2014-2220-CDP, TT-70786** . Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impact(s) on the environment (after mitigation) **will not:**

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

ADDITIONAL INFORMATION:

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

For City information, addresses and phone numbers: visit the City's website at http://www.lacity.org ; City Planning - and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps - http://gmw.consrv.ca.gov/shmp/
Engineering/Infrastructure/Topographic Maps/Parcel Information - http://boemaps.eng.ci.la.ca.us/index01.htm or
City's main website under the heading "Navigate LA".

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:
JULIET OH	Planning Assistant	(213) 978-1186	08/08/2014

	Impact?	Explanation	Mitigation Measures

APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

I. AESTHETICS			
a.	LESS THAN SIGNIFICANT IMPACT	The project area is characterized as a beach community consisting of single-family and multiple-family residential land uses, retail, and restaurant buildings. The residential and commercial uses surrounding the project site have heights ranging from one to four stories. Limited views of the ocean are currently available from Vista Del Mar, Culver Boulevard, and Trolley Place, as well as from Montreal Street on the bluff overlooking the project site vicinity. Views across the project site from Vista Del Mar are narrow and intermittent, as residential buildings west of Vista Del Mar, Trolley Place, and Trolley Way (some of which are up to three stories), and commercial and residential buildings north of Culver Boulevard, partially or fully obstruct ocean views. Some narrow views currently exist across the project site from Vista Del Mar and broader ocean views are available from Montreal Street. Development of the project would obstruct the limited available views from the segment of Vista Del Mar that fronts the project site. Ocean views from Montreal Street would be partially obstructed, but ocean views over the proposed structure would remain available. (See also Figure IV-1, Line of Sight.) Existing, though narrow, views northwest from Trolley Place and west from Culver Boulevard would remain. However, views from private property are not subject to protection. Moreover, the project would include improvements such as outdoor seating along Culver Boulevard and Trolley Place that would increase opportunities for viewing along sidewalks associated with these roadways. As such, these views would not be significantly impacted, and a less than significant impact would occur as a result of the proposed project.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact would occur only if scenic resources would be damaged or removed by a project within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site, and none of**	**I-10 Mitigation measures will be incorporated to ensure the existing visual character of the site is not substantially degraded and to reduce impacts to a less than significant level.**

	Impact?	Explanation	Mitigation Measures
		the existing vegetation on-site is considered a protected species. Vista Del Mar is designated as a Scenic Major Highway, Class II with sand dunes and ocean views (City of Los Angeles Transportation Element, 1999). However, the project would not damage scenic resources including trees, rock outcroppings, or historic buildings, and would replace an unimproved vacant lot with groundfloor retail uses, public seating areas, pedestrian improvements and attractive landscaping. The proposed project will not damage any scenic resources and will comply with the required mitigation measures to reduce the impact of the new four-story building on a vacant lot.	
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	A significant impact may occur if a project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site. The project area is characterized as a beach community consisting of single-family and multiple-family residential land uses, retail, and restaurant buildings. The residential and commercial uses surrounding the Project Site have heights ranging from one to four stories. The remainder of the Playa Del Rey community includes additional commercial and single- and multi-family residential uses. The proposed project would develop approximately 72 residential units and a total of approximately 14,500 square feet of neighborhood-serving commercial uses consisting of 13,000 square feet of retail and 1,500 square feet of restaurant uses on a site that is undeveloped. The proposed project would provide neighborhood-serving commercial uses and improved pedestrian-friendly areas and landscaped walkways along Culver Boulevard and Vista Del Mar. Furthermore, the use of articulated facades, architectural details, and various building materials will break up the massing and reduce the impact of the four-story building.	I-10

	Impact?	Explanation	Mitigation Measures
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact may occur if a project were to introduce new sources of light or glare on or from the project site which would be incompatible with the area surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The surrounding area is illuminated by freestanding streetlights, indoor building illumination (light emanating from the interior of structures that passes through windows), and lighting from the surrounding commercial and residential uses. Vehicle headlights from traffic on local surface streets also contribute to overall ambient lighting levels. The construction of the proposed mixed-use would create additional sources of illumination on the project site. However, the project area is already illuminated, as described above. In addition, exterior lighting would be shielded and directed onto the project site and away from adjacent uses to the maximum extent feasible. Nighttime light pollution shall be minimized by shielded lighting. Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. However, the project would limit reflective surface areas and the reflectivity of architectural materials used and use glass with low-reflectivity and treated with a non-glare coating. The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. The project would contain four levels within a building height of 51'-0" to the roof and 56'-0" to the parapet. Buildings that are less than 60 feet in height would not be capable of producing shadows that would exceed the City of Los Angeles Threshold. As such, the project would result in a less than significant impact. Compliance with the following mitigation measures**	**I-120, I-130** **Potential lighting/glare impacts created by the project shall be mitigated as referenced to reduce impacts to surrounding residential uses to a less than significant level.**

	Impact?	Explanation	Mitigation Measures
		would reduce the potential impacts of light and glare to a less than significant level.	
II. AGRICULTURE AND FOREST RESOURCES			
a.	NO IMPACT	The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The project site is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category. Therefore, the project would have no impact on the conversion of farmland to non-agricultural uses.	
b.	NO IMPACT	The project site is not zoned for agricultural use and the project will not involve any agricultural use. Thus the project will not conflict with existing zoning for agricultural use or a Williamson Act Contract.	
c.	NO IMPACT	The project site is zoned [Q]C4-1VL, for primarily Commercial and Residential uses. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. As such, no impacts related to forest land or timberland would occur.	
d.	NO IMPACT	The project site is vacant and does not contain forest land, nor is it surrounded by forest land. Therefore, no impact related to the loss of forest land or conversion of forest land would occur as a result of the proposed project.	
e.	NO IMPACT	A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the project site nor surrounding parcels are utilized for agricultural uses or forest land. No impacts related to the conversion of farmland to a non-agricultural use, or conversion of forest land to a non-forest use, would occur as a result of the proposed project.	
III. AIR QUALITY			
a.	LESS THAN SIGNIFICANT IMPACT	The applicable air quality plan that lays out a strategy to achieve the 8-hour ozone (smog) standard is the SCAQMD's 2012 Air Quality Management Plan (AQMP). The AQMP outlines a path to attainment of the ozone standard by 2023 based on population and employment growth assumptions from the Southern	

	Impact?	Explanation	Mitigation Measures
		California Association of Governments' (SCAG) 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The AQMP also identifies the strategy to meet the federal 24-hour PM2.5 standard by 2014. As a result, the proposed project is consistent with the AQMP if it is consistent with: a) growth assumptions from the RTP/SCS and b) the rules and regulations in the Plan itself. The proposed residential, retail, and restaurant land uses would not conflict with the growth assumptions in SCAQMD's 2012 Air Quality Management Plan. Specifically, the proposed project would add 72 residential units to the City of Los Angeles. The SCAG RTP/SCS forecasts a housing increase of 316,700 units from 2008 through 2035. Based on the Westchester Community Plan's estimate of 2.05 persons per household, the project could increase the City's residential population by 148 persons. The SCAG RTP forecast a population increase of 550,100 from 2008 through 2035. All the growth associated with the project is well within parameters needed to allow attainment of ozone standard on schedule. Moreover, the proposed project is infill development that helps to ensure that the jobs and vehicle travel associated with this project have less impact on air quality emissions than a project located in areas with less residential density and/or transportation infrastructure. In addition, the project would not conflict with the implementation of control measures or rules and regulations from the SCAQMD's 2012 AQMP. For example, the project would be subject to Rule 403, which governs the control of fugitive dust during construction activities. As a result, the proposed project would be consistent with the SCAQMD's 2012 AQMP and would have a less than significant impact.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The analysis of daily construction emissions was prepared using the CalEEMod computer model recommended by the SCAQMD. As indicated by the Air Quality and Greenhouse Gas Study prepared by DKA Planning, 2013 (CAJA Environmental Services, 2014), the construction of the proposed project would not produce VOC, NOX, CO, SOX, PM10 and PM2.5 emissions that exceed the SCAQMD's regional**	**III-10** **Because of the non-attainment status of the South Coast Air Basin (SCAB) for airborne particulate matter Best Available Control Measures (BACMs) shall be used where feasible, and an aggressive dust control program will be required to control fugitive dust.**

	Impact?	Explanation	Mitigation Measures
		thresholds. In addition, construction-related emissions of NO2 and CO would not exceed the SCAQMD's suggested localized thresholds of significance. However, on-site PM10 and PM2.5 emissions from off-road equipment would exceed the suggested thresholds of 5 lb/day and 1 lb/day of emissions, respectively, during the grading and construction phases. The mitigation measures in this section will reduce any potential impacts related to construction activity to a less than significant level. These thresholds reflect the close proximity of apartments directly south of the project site. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the project site after occupation: consumption of natural gas, landscaping maintenance, and vehicle travel to and from the site. Based on the analysis of daily operational emissions (DKA Planning, 2013 based on CalEEMod 2013.2.2 model analysis), the project's long-term air quality impacts to the region result primarily from motor vehicles that are expected to access the project site. The project could add up to 1,163 more vehicle trips to and from the area on its peak day, with up to 147 vehicles entering and exiting the project site in the peak afternoon hour. However, the proposed project would not exceed any of the SCAQMD's recommended regional thresholds of significance. Furthermore, compliance with the Mitigation Measures in this section are expected to reduce any potential impacts to a less than significant level.	
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The project would not contribute cumulatively considerable net increases in any criteria pollutant emissions. Specifically, growth associated with the project would be consistent with assumptions from the region's 2012 AQMP that addresses cumulative regional emissions of ozone precursors. Further, the project would comply with all applicable control measures, rules and regulations from the 2012 AQMP. On a local level, compliance with the	III-10 Because of the non-attainment status of the South Coast Air Basin (SCAB) for airborne particulate matter Best Available Control Measures (BACMs) shall be used where feasible, and an aggressive dust control program will be required to control fugitive dust.

	Impact?	Explanation	Mitigation Measures
		mitigation measures would reduce construction-related emissions below the SCAQMD's local thresholds of significance.	
d.	LESS THAN SIGNIFICANT IMPACT	The proposed project would not contribute to localized violations of the CO or NOx standards, as it would not result in emission levels that exceed the LST thresholds set by the SCAQMD. Emissions of PM10 and PM2.5 could result in local exceedances of the applicable standards at adjacent receptors near the site (DKA Plannng, CalEEMod Analysis). However, the required mitigation measures would reduce emissions of PM10 and PM2.5 concentrations below LST thresholds. As a result, the proposed project would not expose sensitive receptors to substantial criteria pollutant concentrations. The project would locate up to 72 residential units, housing approximately 148 new residents, in the area. However, these residents would not be exposed to substantial pollution concentrations: there are no substantial upwind sources of TACs or localized criteria pollutants, the traffic volumes on nearby Culver Boulevard and Vista Del Mar would not generate high enough concentrations of CO because of the existing and projected congestion levels and the substantial dispersion of CO emissions from these downwind streets away from the project site, and the average temperatures in this temperate beachside location are not conducive to CO hotspots.	
e.	NO IMPACT	The proposed development of the mixed-use project would introduce new retail, restaurant, and residential uses to the area, but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD's Rule 402 that governs nuisances can address any unpleasant odors from the future restaurant uses. As a result, no significant odor impacts are expected from the proposed project.	
IV. BIOLOGICAL RESOURCES			

	Impact?	Explanation	Mitigation Measures
a.	NO IMPACT	A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS). The subject site is currently vacant and lacks vegetation that would support any wildlife. According to a Biological Resources Assessment prepared by Cooper Ecological Monitoring INC, dated September 17, 2012, wildlife activity was observed to be very low and did not exhibit features of any special status habitats. Two sensitive plant communities are listed for the Venice quadrangle (USGS) by CNDDB, Southern Dune Scrub and Southern Coastal Salt Marsh, however, the habitat at the project site itself is reported as being highly disturbed and not recognizable as a plant community. The project site itself contains little suitable habitat for wildlife, and the perimeter of the Site is largely occupied by residential and commercial urban development. No sensitive plant or wildlife species would be expected to occur on the project site.	
b.	NO IMPACT	The project site is a flat, vacant, dirt lot located at sea level, approximately 300 meters from the Pacific Ocean coastline. The soil where the lot is located is mapped as "beach deposits," but due to an apparent history of grading, the soil present is highly disturbed. No riparian or wetland vegetation was observed at the project site. The project site is not within any Significant Ecologic Area (SEA) of the City. The nearest SEA is the Coastal Habitant at the Pacific Ocean and the County's Ballona Creek. The Project site is not within a riparian habitat. Therefore, no impact to riparian or sensitive natural community would occur.	
c.	NO IMPACT	No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on the project site. The nearest wetlands are the estuarine and marine of the Pacific Ocean, a freshwater pond at Del Rey Lagoon Park, and freshwater emergent at Ballona Creek. Therefore, the project would not result in the direct removal,	

	Impact?	Explanation	Mitigation Measures
		filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act, and no impact to federally protected wetlands would occur.	
d.	NO IMPACT	No nesting bird habitat is found on the project site, and the vegetation adjacent to the project site contains limited suitable habitat for tree and shrub-nesting avian species protected under the Migratory Bird Treaty Act and California Department of Fish and Game Code. Therefore, the project would have no impact with respect to nesting birds.	
e.	NO IMPACT	A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. No native shrubs or shrubby trees are found in the project site, nor at the perimeter of the Site. No protected biological resources or tree species, such as oak trees, currently exist on the Site. Therefore, no impact would occur with respect to local policies or ordinances protecting or preserving biological resources.	
f.	NO IMPACT	No locally designated natural communities are known to occur on or adjacent to the project site. There are no known locally designated natural communities on the project site or in the vicinity. The project site is not part of any Critical Habitat as mapped by the U.S. Department of Fish and Wildlife Services and is also not within any Significant Ecologic Area (SEA) of the City. The project site is not within a Habitat Conservation Plan (HCP) or Natural Conservation Community Plan (NCCP). The nearest mapped HCP or NCCP is around the Palos Verdes Hills peninsula. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan.	
V. CULTURAL RESOURCES			

	Impact?	Explanation	Mitigation Measures
a.	LESS THAN SIGNIFICANT IMPACT	The project site is currently undeveloped. A previously demolished, vacant, commercial building was located at the corner of Vista Del Mar and Trolley Avenue. According to the 6917 Vista Del Mar, Los Angeles, Historic Resource Report prepared by Galvin Preservation Associates (September 2012), the demolished structure previously located at 6917 was not designated as a historic resources or historic-cultural monument, nor would it have been eligible for National or State Register. As such, the development of the proposed project would have no impact on historic resources.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles, and has been partially disturbed by past development activities such as grading to construct the structure that previously existed on the Project Site. In addition, the presence of shallow groundwater makes it unlikely that any archaeological resources would be discovered during construction activities. However, the subject site is located in the vicinity of an Archaeological Site and Survey Areas so there is a possibility that archaeological resources could be discovered (Prehistoric & Historic Archaeological Sites & Survey Areas, 1996). Compliance with the following mitigation measure would reduce potential impacts to a less than significant level.**	**V-20** **Environmental impacts may result from the project implementation due to the discovery of unrecorded archeological resources. However, the potential impacts will be reduced to a less than significant level by implementing the cultural resource mitigation measures. Discovery of potential archeological resources will require expert documentation, evaluation, and conservation prior to the recommencement of work.**
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is located in the Playa Del Rey community of the City of Los Angeles, and a portion of the Site has been disturbed by past development activities. The presence of shallow groundwater makes it unlikely that any paleontological resources would be discovered during construction activities, however, there is a remote possibility that unsuspected vertebrate fossil remains could exist below the ground and could be encountered during excavation necessary or grading.**	**V-30** **Environmental impacts may result from the project implementation due to the discovery of unrecorded paleontological resources. However, the potential impacts will be reduced to a less than significant level by implementing the cultural resource mitigation measures. Discovery of potential paleontological resources will require expert documentation, evaluation, and conservation prior to the recommencement of work.**

	Impact?	Explanation	Mitigation Measures
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles, and has been partially disturbed by past development activities. Any surficial human remains that may have existed at one time have likely been previously unearthed or disturbed. In addition, the presence of shallow groundwater makes it unlikely that any human remains would be discovered during construction activities. Nevertheless, there is still the remote possibility that human remains could be discovered. Compliance with the mitigation measures would ensure that impacts related to the discovery of human remains are less than significant.**	**V-40** **Environmental impacts may result from the project implementation due to the discovery of unrecorded human remains. However, the potential impacts will be reduced to a less than significant level by implementing the attached mitigation measures.**
VI. GEOLOGY AND SOILS			
a.	LESS THAN SIGNIFICANT IMPACT	The site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the Site during the design life of the proposed development is considered low. The site, however, is located in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest active fault to the site is the Palos Verdes Fault Zone located 4.8 miles southwest of the site. The City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the project would have a less than significant impact related to ground rupture from known earthquake faults.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and conformance with current building codes and engineering practices can**	**VI-10, VI-50** **The Geotechnical Investigation, prepared by Geocon West, Inc., dated December 1, 2009 is subject to review and approval by the Los Angeles Department of Building and Safety**

	Impact?	Explanation	Mitigation Measures
		mitigate the potential impacts of strong seismic ground shaking. The design and construction of the project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements and these mitigation measures would minimize the potential to expose people or structures to substantial risk, loss, or injury; reducing the potential impacts to a less than significant level.	**Grading Division. The project shall comply with all conditions contained in the LADBS Geology and Soils Approval Letter.**
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**According to the State of California Seismic Hazard Zone, Venice Quadrangle Map (1999) and the City of Los Angeles Seismic Safety Element (1996) the project site is located within an area identified as having a potential for liquefaction. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Compliance with the mitigation measures outlined in this section and as required by the LADBS will reduce any potential impacts to a less than significant level.**	**VI-10, VI-50, VI-70**
d.	LESS THAN SIGNIFICANT IMPACT	A project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the State of California Seismic Hazard Zone, Venice Quadrangle Map (1999) the site is not within an area identified as having a potential for slope instability. Additionally, according to the County of Los Angeles Seismic Safety Element (Leighton, 1990) and the City of Los Angeles Seismic Safety Element (1996), the site is not located within an area identified as having a potential for seismic slope instability. The hillside area immediately east of Vista Del Mar is indicated as a Landslide Area (ZIMAS, NavigateLA), however the 60-foot	

	Impact?	Explanation	Mitigation Measures
		roadway provides a sufficient buffer between the moderate hillside and the subject property. The development of this project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The project with export 29,700 cubic yards of dirt and is located on a site with a very minimal slope (has a slope of less than 10 percent). The project site is currently undeveloped. Any loose topsoil that was previously onsite has been removed by wind and water/rain erosion, leaving artificial fill. During construction, the grading and excavation would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion would not occur during project construction. Adherence to City regulations and these mitigation measures will reduce any potential impacts to a less than significant level.**	**VI-20**
f.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations, thus posing a hazard to life and property. Although the property is located within a liquefaction area (ZIMAS) construction activities associated with the project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Further, the project would comply with Mitigation Measure IV-20, reducing any potential impacts to a less than significant level.**	**VI-20**
g.	NO IMPACT	Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. The soils encountered at the lowest subterranean levels are primarily granular in nature and are considered to be	

	Impact?	Explanation	Mitigation Measures
		"non-expansive." As such, the project would result in no impacts related to expansive soils.	
h.	NO IMPACT	The project site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are proposed.	
VII. GREEN HOUSE GAS EMISSIONS			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The construction of the proposed project would emit greenhouse gas (GHG) emissions through the combustion of fossil fuels from a variety of area, mobile, and energy sources and processes, including the operation of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the project site. These impacts would vary day to day over the duration of construction activities. project-specific mitigation measures will be required in order to reduce the cumulative impact of the project.**	**VII-10**
b.	LESS THAN SIGNIFICANT IMPACT	The project would contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. However, the California Air Resources Board's (CARB) AB 32 Scoping Plan provides the basis for policies that would reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the proposed project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. The project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the project's cumulative impact on climate change is considered less than significant.	
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	LESS THAN SIGNIFICANT IMPACT	The project involves the construction of approximately 72 residential units and 14,500 square feet of commercial space including 13,000 square feet of retail and 1,500 square feet of restaurant uses. Other than the typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported, or disposed of in conjunction with the routine	

	Impact?	Explanation	Mitigation Measures
		day-to-day operations of the project. Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment, a less than significant impact would occur.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**According to the Phase I Environmental Site Assessment prepared by Environmental Engineering & Contracting, Inc., dated November 16, 2009, the subject site previously maintained a gasoline service station (1961) and lubrication bay (1967). While both uses and structures (underground storage tanks removed in 1982) are no longer present, mitigation measures are included to reduce any potential impacts to a less than significant level. Regulatory records review did not indicate the current registration of USTs at the site, and no evidence of vent pipes, fill pipes, or access ways indicating USTs was discovered at the time of the site reconnaissance. Furthermore, testing of the soil showed that the underground storage tanks did not result in significant impacts to the subsurface. The subject site is not located within the boundaries of an oil field, but is located within a Methane Zone (ZIMAS). As such, the project would follow all applicable LADBS requirements during construction and operation.**	**VIII-20**
c.	NO IMPACT	There are no schools within 0.25 miles (1,320 feet). The nearest school is Paseo Del Rey Natural Science Academy (LAUSD elementary school grades 1-5), approximately 4,100 feet from the Project Site. In addition, the project would not be expected to emit any hazardous substances during construction or operation as a residential and commercial land use.	

	Impact?	Explanation	Mitigation Measures
d.	NO IMPACT	The subject site is currently vacant and is not identified as a hazard waste facility subject to corrective action nor is it a site listed pursuant to Section 253556 of the Health and Safety Code. Therefore, it would not result in a significant hazard to the public or environment.	
e.	NO IMPACT	The nearest airport to the project site is Los Angeles International Airport (LAX), approximately 0.9 miles to the south. However, the Project is not within the boundaries of the governing airport land use plan (LAX Specific Plan). In addition, the project would include residential and commercial spaces, which are land uses that already exist in the area. The project would not create a unique safety hazard for people residing or working in the area. Therefore, no impact would occur.	
f.	NO IMPACT	This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no private airstrips in the vicinity of the project site, and as such, no impacts would occur.	
g.	LESS THAN SIGNIFICANT IMPACT	Construction of the project would not substantially impede public access or travel on public rights-of-way and would not interfere with any adopted emergency response plan or emergency evacuation plan. As analyzed in Section XVI Transportation, the project would not result in significant impacts at any of the six study intersections during the morning and afternoon peak hours. The nearest Disaster Route is along Manchester Boulevard (Critical Facilities and Lifeline Systems in the City of Los Angeles, 1996). Therefore, the project's impacts to area traffic would have no significant impacts on nearby roadways or intersections, and would not interfere with an emergency response or evacuation plan.	
h.	NO IMPACT	The project site is not located in an area of selected wildland fire hazards, Mountain Fire District, or Fire Buffer Zone. Further, the project site is not located in a Very High Fire Hazard Severity Zone. Therefore, no impacts would occur.	
IX. HYDROLOGY AND WATER QUALITY			

	Impact?	Explanation	Mitigation Measures
a.	LESS THAN SIGNIFICANT IMPACT	Pursuant to the NPDES, the project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP) and the City's Low Impact Development (LID) section of the Development Best Management Practices (BMP) Handbook. The project would be required to obtain an NPDES water quality permit from the LARWQCB. Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water. The project would also be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). In addition, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The project would comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, the project would result in a less than significant impact related to water quality.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**Based on a review of the Seismic Hazard Zone Report for the Venice 7.5 Minute Quadrangle, Los Angeles County, California (California Division of Mines and Geology, 1998), the historically highest groundwater level in the area is approximately 5 feet beneath the ground surface. Groundwater was encountered in Geocon's borings (Geotechnical Investigation, prepared by Geocon West Inc., December 1, 2009) as well as the prior site explorations by others at depths ranging from 7 to 8 feet (elevations 3 to 4 feet MSL) beneath the ground surface. It is not uncommon for groundwater levels to vary seasonally or for groundwater conditions to develop where none previously existed, especially along impermeable fine-grained silts or**	**IX-10**

	Impact?	Explanation	Mitigation Measures
		clays, areas which are heavily irrigated or after seasonal rainfall. Proper surface drainage of irrigation and precipitation would be critical to future performance of the project. Environmental impacts to groundwater quantity may result from implementation of the proposed project through direct additions or withdrawals, or through substantial loss of groundwater recharge capacity. Compliance with LADBS requirements and these mitigation measures will reduce any potential impacts to a less than significant level.	
c.	LESS THAN SIGNIFICANT IMPACT	The project site is located in an urbanized area of the City of Los Angeles. No natural watercourses, including streams and rivers, exist on the Project Site. The nearest open surface water is the Del Rey Lagoon (830 feet north), Ballona Creek inlet (2,100 feet north), and Marina Del Rey inlet (4,000 feet north). Drainage from the project site currently drains into the existing storm drains, via a surface flow. Further, the Project would comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading, excavation, and fill activities, as well as the SUSMP, which addresses erosion control through peak-flow reduction and infiltration features. Thus, the project would not substantially alter the existing drainage pattern of the area surrounding the project site such that it would result in substantial erosion or siltation on- or off-site.	
d.	LESS THAN SIGNIFICANT IMPACT	The construction of new buildings would alter the existing drainage pattern of the project site by increasing the impervious surface area. The project site is currently undeveloped and covered with dirt and shrubs. However, no natural watercourses exist on or in the vicinity of the project site, and runoff flows toward the existing storm drain system. No flooding is expected to occur on- or off-site due to the grades of the adjacent streets. Impacts related to runoff, including through the alternation of the course of a stream or river, would therefore be less than significant.	

	Impact?	Explanation	Mitigation Measures
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**Three general sources of potential short-term construction-related stormwater pollution associated with the project are: the handling, storage, and disposal of construction materials containing pollutants; the maintenance and operation of construction equipment; and earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Activities associated with operation of the 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, as the project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations and these mitigation measures would ensure that operational water quality impacts would be less than significant.**	**IX-20**
f.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**Three general sources of potential short-term construction-related stormwater pollution associated with the project are: the handling, storage, and disposal of construction materials containing pollutants; the maintenance and operation of construction equipment; and earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Activities associated with operation of the 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,**	**IX-20**

	Impact?	Explanation	Mitigation Measures
		and suspended solids to the storm drain system. However, impacts to water quality would be reduced, as the project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations and these mitigation measures would ensure that operational water quality impacts would be less than significant.	
g.	NO IMPACT	The project would include housing, but would not be located in a 100-year flood zone. As such, the project would have no impact with respect to placing housing within a 100-year flood zone.	
h.	NO IMPACT	The project site is not located within a City-designated 100-year floodplain. As such, the project would have no impact with respect to placing structures within a 100-year flood zone which would impede or redirect flood flows.	
i.	LESS THAN SIGNIFICANT IMPACT	The surrounding area around Marina Del Rey and the Ballona Creek have the potential to flood. Nonetheless, these areas (including all dams and levees), as with other reservoirs and dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam and reservoir failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams and reservoirs are intended to ensure that all dams and reservoirs are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the development of the project, and the project would result in a less than significant impact.	

	Impact?	Explanation	Mitigation Measures
j.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is two blocks from the start of the beach and approximately 850 feet inland from the Pacific Ocean. According to the Los Angeles County All Hazard Mitigation Plan, the project site is location within a designated 500-year flood plain area. The site is also located in a tsunami inundation area and could be prone to hazards of a tsunami (ZIMAS, NavigateLA). Environmental impacts may result due to the location of the project in an area which is potentially subject to flood hazards. However, compliance with the requirements of the Flood Hazard Management Specific Plan Ordinance No. 172081, effective 7/3/98 (Mitigation Measure IX-120) would ensure that impacts related to flood hazards remain less than significant.**	**IX-120**
X. LAND USE AND PLANNING			
a.	NO IMPACT	The project is not of the scale or nature that could physically divide an established community. The project site is currently vacant; no residential uses or communities would be divided as a result of the project. As such, the project would have no impact related to physical division of an established community.	
b.	NO IMPACT	The subject property is currently zoned [Q]C4-1VL, with a permitted density of 400 square feet per dwelling unit (LAMC). The proposed project includes the development of 72 dwelling units, 8 of which are affordable units, and 14,500 square feet of commercial uses on the ground floor. The project also includes an on-menu incentive for an increase in floor area from the allowed 1.5:1 to 2.025:1 and an off-menu incentive for an 11-foot increase in height through the Density Bonus Ordinance (consistent with SB1818). The project is consistent with the Coastal Transportation Corridor Specific Plan, Westchester-Playa Del Rey Community Plan, General Plan, and all applicable City and Regional Plans. The project is also within the Coastal Zone and complies with the development regulations outlined in Chapter Three of the Coastal Act: Coastal Resource Planning and Management Policies.	

	Impact?	Explanation	Mitigation Measures
c.	NO IMPACT	The project site and the surrounding area are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The project site is currently undeveloped and is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles. Therefore, no impacts to any adopted habitat or conservation plans would occur as a result of the project.	
XI. MINERAL RESOURCES			
a.	NO IMPACT	Neither the project site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance and is not part of any Oil Drilling and Surface Mining Supplemental Use District. Furthermore, the property is located in an urban setting which is already developed with single- and multi-family residences and is therefore not likely to be a suitable site for drilling or mining. Therefore, no impact is expected.	
b.	NO IMPACT	The property is located in an urban setting which is already developed with single- and multi-family residences and is therefore not likely to be a suitable site for drilling. According to the City's Conservation Element if the General Plan (2001), the primary mineral resources with the city are rock, gravel, and sand deposits; identified by the MRZ-2 zones throughout the City. Furthermore, non on-or off-shore mining of beach or ocean sand is permitted by the State of California within the Coastal Zone (Conservation Element, 2001). As such, the project is expected to have no impact on mineral resources.	
XII. NOISE			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**During construction, ground clearing, grading, structural, and other activities at the project site would occur between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the City of Los Angeles Municipal Code (LAMC). These activities would increase ambient noise levels above 75 dBA at the apartments on Trolley Place south of the project site, the apartments on Convoy Street to the west of the proposed project, and at the single family residences on**	**XII-20, XII-40, XII-60, XII-170, XII-230**

	Impact?	Explanation	Mitigation Measures
		Montreal Street to the east of the site. There would also be an increase in ambient noise levels of 5 dBA or more at each identified receptor. Long-term operation of the project is expected to result in an incremental increase in ambient noise levels (vehicular noise, mechanical equipment, and parking) and would locate new noise-sensitive receptors at the project site. However, compliance with the City's established policies and regulations, and the following mitigation measures is expected to reduce any potential impacts to a less than significant level.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. The proposed project is expected to create a temporary increase in groundborne noise during the construction phase, however, such an increase is short-term. The long-term operation of the project is not expected to meet or exceed the threshold of 75 or more dwelling units, 100,000 square feet or greater non-residential development, or have the potential to generate 1,000 or more average daily vehicle trips. Therefore, compliance with the City's established policies and regulations, and the following mitigation measures is expected to reduce any potential impacts to a less than significant level.**	**XII-230**
c.	LESS THAN SIGNIFICANT IMPACT	As detailed in an Environmental Analysis prepared by CAJA Environmental Services (2014), the greatest project-related noise increase would be 1.5 dBA Leq along Culver Boulevard between Pacific Avenue and Vista Del Mar Lane. The project's noise impacts	

	Impact?	Explanation	Mitigation Measures
		would not cause the ambient noise level measured at the property line of the affected uses to rise to the "normally unacceptable" or "clearly unacceptable" category or result in any 5-dBA or more increase in noise level. As a result, vehicular noise would result in a less than significant impact. Noise impacts from parking would not expose residents or future employees to excessive noise levels, nor would stationary equipment (e.g., air handlers, exhaust fans), which would only increase noise levels at nearby residential uses by 0.7 dBA after mitigation. This incremental increase would not be audible, and stationary noise would result in a less than significant impact.	
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A temporary increase in noise levels is expected to occur during the construction phase, due to the heavy construction equipment and related activity. Ground clearing, grading, structural, and other activities at the project site would occur between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the City of Los Angeles Municipal Code (LAMC). The proposed project would create significant increases in ambient noise exceeding 75 dBA at the adjacent apartments at on Trolley Place. However, compliance with the mitigation measures outlined in this section would reduce construction noise impacts at nearby sensitive receptors to less than 75 dBA, less than a 5 dBA increase from existing ambient noise levels; reducing any potential impacts to a less than significant level.**	**XII-230**
e.	LESS THAN SIGNIFICANT IMPACT	The subject property is located about one mile northwest from the Los Angeles International Airport, a public airport operated by Los Angeles World Airports; according to the LAX 2009 Third Quarter Noise Report, the project lies outside of the 65 CNEL contour. While aircrafts approaching and leaving the airport do contribute to ambient noise levels, the predominant noise source for existing residents and future workers is vehicular traffic. Any such impacts would be reduced to a less than significant level by the mitigation measures outlined in this section.	

	Impact?	Explanation	Mitigation Measures
f.	NO IMPACT	The proposed project is not located within the vicinity of a private airstrip. Therefore no impacts are expected to occur.	
XIII. POPULATION AND HOUSING			
a.	LESS THAN SIGNIFICANT IMPACT	The proposed project is expected to add 148 residents, 20 employees, and 72 new dwelling units to the Westchester-Playa Del Rey Community Plan Area, well within estimates of growth for the Community Plan Area (CAJA Environmental Services, September 2012). The project would also further the goals and objectives of the Housing Element by providing additional housing stock, of which eight are for very low income households. The project would not constitute a substantial growth in population and would be supported by existing infrastructure, as such, a less than significant impact is expected.	
b.	NO IMPACT	The subject site is currently vacant, there are no dwelling units on the site. The project would not result in the displacement of any housing units, and as such, no impact would occur.	
c.	NO IMPACT	The subject site is currently vacant, there are no dwelling units on the site. The project would not result in the displacement of any people, and as such, no impact would occur.	
XIV. PUBLIC SERVICES			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is served by the Los Angeles Fire Department (LAFD) Station No. 67, located at 5451 Playa Vista Drive, approximately 1.7 miles south of the property. Because the response distance exceeds 1.5 miles (LA CEQA Thresholds Guide, 2006), the structure shall, consistent with standard City requirements, include automatic fire sprinkler system. Emergency vehicle access to the site would continue to be provided from local and major roadways (i.e. Jefferson Boulevard and Culver Boulevard). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the project site would be maintained at all times during both project construction and operation. Therefore, any potential impacts would be reduced to a less**	**XIV-10** **A review of the proposed project by the Los Angeles Fire Department will ensure that the proposed project will be mitigated to a less than significant level.**

	Impact?	Explanation	Mitigation Measures
		than significant level by complying with all fire safety requirements of the Department of Building and Safety, the Los Angeles Fire Department, and these mitigation measures.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is currently served by the City of Los Angeles Police Department's (LAPD) Pacific Community Police Station, located at 12312 Culver Boulevard, which is approximately 2.9 miles northeast of the property. The Pacific Community Police Station is under the jurisdiction of the West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire areas. The Pacific Community Police Station service area encompasses approximately 200,000 persons in approximately 24.1 square miles. Development of the project would include construction of new residential and commercial uses that could potentially increase in the number of police service calls due to an increase in onsite residents, employees and customers. However, the potential for crime can be reduced with site-specific designs and features, which would be incorporated into the project. These features may include, but are not limited to, access control to the 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. The project would include standard residential and commercial security measures such as adequate security lighting, surveillance cameras, anti-theft devices in retail stores, and secured parking and gate access for residents. Therefore compliance with the mitigation measures included in this section would reduce any potential impacts to a less than significant level.**	**XIV-20, XIV-30** **A review of the proposed project by the Los Angeles Police Department will ensure that the proposed project will be mitigated to a less than significant level.**

	Impact?	Explanation	Mitigation Measures
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project site is served by the following Los Angeles Unified School District (LAUSD) schools: Paseo Del Rey Natural Science Magnet Elementary School, Loyola Village Elementary School, Kentwood Elementary, Wright Middle School, Westchester Enriched Sciences Magnet, and Venice High School. The proposed project would add 72 residential units and would generate approximately 29 students. Payment of the required school fees to the Los Angeles Unified School District is expected to offset the impact of additional student enrollment and reduce any potential impacts to a less than significant level.**	**XIV-60** **Payment of the required school fees to the Los Angeles Unified School District is expected to offset the impact of additional student enrollment at schools serving the project area.**
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The proposed project will increase the population density within the area but will not require any major acquisition or expansion of existing open space and parkland. The property is located near Del Rey Lagoon, Titmouse Park, the Westchester Recreation Center, and is one block west of the beach. The development of 72 dwelling units exceeds the threshold of 50 units (LA CEQA Thresholds Guide, 2006), however, payment of the City's Dwelling Unit Tax (required in Section XV.a.) is expected to mitigate any increased demand on parkland and open space.**	**Payment of the City's Dwelling Unit Tax (required in Section XV.a.) is expected to mitigate any increased demand on parkland and open space.**
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project does not propose any significant increase in population density that would generate the need to require new roads, additional infrastructure, or other governmental services. However, the property owner will be required to make dedications and improvements to Vista Del Mar, Culver Boulevard, and Trolley Place as a result of increased traffic generation. Damage may be incurred to the roadway adjacent to the property as a well. However, compliance with the mitigation measures outlined in Section XVI. Transportation and this section will reduce any potential impacts to a less than significant level.**	**XIV-70, XIV-80** **A review of the proposed project by the Department of Public Works, Bureau of Engineering and the recommended Construction Damage Bond will ensure that the proposed project will be mitigated to a less than significant level.**
XV. RECREATION			

	Impact?	Explanation	Mitigation Measures
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The proposed project is anticipated to slightly increase the use of existing neighborhood/regional parks and recreational facilities, however the project is not proposing a significant increase in population density that would cause or accelerate a substantial physical deterioration of these resources. Although future residents/employees of the project may use the existing parks near the project, they would also use the 5,062 square feet of common open space and 3,600 square feet of private open space provided by the project. Payment of the City's Dwelling Unit Tax is expected to mitigate any increased demand on neighborhood and regional parks or other recreational facilities.**	**XV-10** **Payment of the City's Dwelling Unit Tax is expected to mitigate any increased demand on parkland and open space.**
b.	LESS THAN SIGNIFICANT IMPACT	The proposed project does not include the construction or expansion of public recreational facilities. However, should the project be revised to include additional private recreational facilities (beyond that analyzed in this document), it will be subject to additional review under the California Environmental Quality Act. The common and private open space provided as part of this project are not expected to have a n adverse physical effect on the environment as they are maintained on the property and subject to the standards of the Department of Building and Safety.	
XVI. TRANSPORTATION/TRAFFIC			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The proposed project (identified as the "modified project") includes the development of 72 residential units, of which 8 are very low income units, and 14,500 square feet of commercial floor area. The proposed project is estimated to generate 984 net new daily trips, 60 new trips in the A.M. peak hour, and 115 net new trips in the P.M. peak hour. The trip generation rates are based on Appendix A of the Coastal Transportation Corridor Specific Plan (CTCSP) Ordinance No. 168,999 and formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 8th Edition, 2008. Although the increase in new daily trips and new trips in the peak AM and PM exceeds the 500 and 43 new trips threshold (respectively),**	**XVI-10** **Compliance with the Project Requirements outlined in LADOT's letter dated, November 15, 2013 and the mitigation measures outlined in this document are expected to reduce any potential impacts to a less than significant level.**

	Impact?	Explanation	Mitigation Measures
		LADOT has determined that the proposed project will not have significant traffic impacts at any of the studied intersections (Traffic Impact Analysis Report and Supplemental TIA for modified project, prepared by Hirsch/Green Transportation Consulting, September 30, 2013). Compliance with the Project Requirements outlined in LADOT's letter dated, November 15, 2013 and the mitigation measures outlined in this document are expected to reduce any potential impacts to a less than significant level.	
b.	LESS THAN SIGNIFICANT IMPACT	The Congestion Management program (CMP) regulates and monitors regional traffic growth and transportation improvement programs; designating a transportation network that includes all state highways and some arterials within the County of Los Angeles. The CMP project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the project could add a total of 50 or more trips during either peak hour. Based on the Traffic Impact Analysis (Hirsch/Green Transportation Consulting, Inc., 2013), the proposed project would significantly exceed CMP's thresholds. Compliance with the requirements outlined by LADOT and these mitigation measures is expected to reduce any potential impacts to a less than significant level.	
c.	NO IMPACT	The project site is located within an Airport Hazard Area (ZIMAS) that establishes a 200-foot height limit above elevation 126 to prevent the obstruction of airspace. The proposed project would not meet or exceed the 200-foot limit, nor would it result in a change in air traffic patterns; therefore, no impacts are expected.	
d.	LESS THAN SIGNIFICANT IMPACT	The project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the site. The project includes one, two-way driveway at the southern façade, facing Trolley Place, however all driveways are subject to review by the LADOT. Therefore, a less than significant impact is expected.	

	Impact?	Explanation	Mitigation Measures
e.	LESS THAN SIGNIFICANT IMPACT	The proposed project site is bound on all three sides by Culver Boulevard and Trolley Place (Pacific Avenue) which are designated as a local streets, and Vista Del Mar which is a Scenic Major Highway, Class II. Although the project is expected to generate new daily trips, the Traffic Impact Analysis (Hirsch/Green Transportation Consulting, Inc., 2013) indicated that the estimated traffic volumes would not significantly impact the study intersections. Further, adherence to the requirements and mitigation measures outlined in this section would result in less than significant impacts.	
f.	NO IMPACT	According to the 2010 Bike Plan, the nearest bicycle facility is an existing bike lane on Culver Boulevard from Pacific Avenue to Nicholson Street. Development of the project site would not impact any alternative transportation policies, plans, or programs, regarding public transit, bicycles, or pedestrian facilities; nor would it decrease the performance or safety of such facilities.	
XVII. UTILITIES AND SERVICE SYSTEMS			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The proposed project is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd). The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. Prior to the issuance of building permits, the project would be required to demonstrate compliance with the monthly allocation set forth by the City's Sewer Allocation Ordinance (Ordinance No. 166,060). Further, the Project would not be able to connect to the City's wastewater system until capacity is available and, therefore, would not cause LABS to exceed LAWQCB treatment requirements. In addition, the HTP is a public facility and is also subject to the State's wastewater treatment requirements. It is estimated that the project would generate approximately 12,680 gallons per day (gpd) (or 0.01268 mgd) of wastewater (LA CEQA Thresholds Guide, 2006). The wastewater generated by the project would be similar to commercial and residential uses in the area. As described above,**	**XVII-80**

	Impact?	Explanation	Mitigation Measures
		there is adequate treatment capacity within the HTP system (approximately 88 mgd) to treat the wastewater generated as a result of the project. Thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. Further, compliance with the mitigation measures in this section are expected to reduce any potential impacts to a less than significant level.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project does not propose the construction of a new water or wastewater treatment facility or expansion of existing facilities, the project site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd). The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity. Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the project and would help reduce the amount of project-generated wastewater.**	**XVII-80**
c.	LESS THAN SIGNIFICANT IMPACT	Runoff currently flows toward existing storm drain system. Development of the project would alter the amount by reducing the impervious surface. The site is currently undeveloped and is covered with dirt and shrubs. The project would reduce impervious surface area by using permeable pavement materials (such as pervious concrete/asphalt, unit pavers, turf block, and granular materials) where appropriate. In addition, the project would include an efficient irrigation system to minimize runoff. The irrigation system would include drip irrigation for shrubs, shutoff devices to prevent irrigation after significant precipitation, and flow reducers. As such, the project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, resulting in a less than significant impact.	

	Impact?	Explanation	Mitigation Measures
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. The project would use 0.01508 mgd, or 17 acre-feet per year (CAJA Environmental Services 2014 and LA CEQA Thresholds Guide, 2006). The 2010 Urban Water Management Plan projects a supply of 555,477 AFY in 2015. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. Overall, any project that is consistent with the General Plan has been taken into account in the planned growth in water demand. Therefore, the project's water supply needs have already been accommodated within water supply projections for the region, and a less than significant impact would occur. In addition, the project would include an efficient irrigation system, and would also include high efficiency toilets, clothes washers, and dishwashers, as well as low flow faucets, which would further reduce the water demands of the project. Furthermore, compliance with the mitigations measures outlined in this section is expected to reduce any potential impacts to a less than significant level.**	**XVII-10, XVII-20, XVII-30, XVII-40, XVII-60**
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project is expected to generate approximately 12,680 gallons per day (gpd) or 0.01268 mgd of wastewater, which would be accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Compliance with the mitigation measures in this section is expected to reduce any potential impacts to a less than significant level.**	**XVII-80**
f.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The proposed project is expected to generate approximately 187 tons of waste during the construction phase, 0.425 tons of waste per day (CAJA Environmental Services 2014). However, compliance with AB 939**	**XVII-90, XVII-100**

	Impact?	Explanation	Mitigation Measures
		would require a minimum of 50 percent of demolition and construction debris to be recycled, reducing any potential impacts to a less than significant level. Regular operation of the project is expected to generate approximately 954 pounds (0.48 tons) of solid waste per day and 3.36 tons of waste per week (CAJA Environmental Services 2014 and LA CEQA Thresholds Guide, 2006); which does not meet or exceed the threshold of five tons per week. Compliance with the required mitigation measures is expected to reduce any potential impacts to a less than significant level.	
g.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**Solid waste generated on-site by the project would be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Management Policy Plan and the Source Reduction and Recycling Element. The project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687. Waste generated by the project would not alter the projected timeline for landfills within the region to reach capacity, compliance with mitigation measures XVII-90 and 100 are expected to reduce any potential impacts to a less than significant level.**	**XVII-90, XVII-100**
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	LESS THAN SIGNIFICANT IMPACT	The proposed project is a 72-unit residential mixed-use building developed on vacant land located in a developed and urbanized region that is mostly segmented and lacks the continuity that is consistent with those known to support any non-avian candidate, sensitive or special-status species. The subject site is currently vacant and lacks vegetated habitat supportive of wild life. The subject site does not contain any riparian habitat or other sensitive natural community, does not contain any wetlands, and has not been identified as being a Significant Ecological Area (City of Los Angeles, Environmental and Public Facilities Map,	

	Impact?	Explanation	Mitigation Measures
		1996). The subject site is not identified as a site nor an area of historical significance, therefore it is unlikely that the proposed project will have impacts on important examples of the major periods of California history. The subject site is in the vicinity of an Archaeological Site and Survey Areas (City of Los Angeles, Environmental and Public Facilities Map, 1996, Prehistoric & Historic Archaeological Sites and Survey Areas Map). However, the mitigation measures proposed in this document are expected to reduce any potential significant impacts to less than significant.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed cumulatively. The project site is located in an urban setting which is already developed primarily with residential and commercial uses; therefore, the possibility of resulting in cumulative impacts in the vicinity is not likely. Any development activity which may occur must comply with all applicable federal, state, and City regulations that would preclude significant cumulative impacts with regard to geology and soils, cultural resources, hazards and hazardous materials, hydrology and water quality, and transportation and traffic. Compliance with City regulations would ensure that any cumulative impacts related to aesthetics and land use would be less than significant. Furthermore, an increase in area population resulting from the proposed project and other development activity in the area are anticipated to be within City and SCAG forecasts; therefore, less than significant cumulative impacts to population and housing are anticipated. Similarly, the demands on public services such as fire and police protection, schools, parks, recreation, and solid waste generation resulting from the proposed project and other development activity in the area are anticipated to be less than significant with the application of the standard mitigation measures proposed in this**	**XVIII-10**

	Impact?	Explanation	Mitigation Measures
		document. As service providers conduct ongoing evaluations to ensure that facilities are adequate to service the forecasted growth of the community, cumulative impacts on utilities are concluded to be less than significant. Overall, with the implementation of the proposed mitigation measures in the environmental review, the project's incremental contribution to cumulative impacts is anticipated to be less than significant.	
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the previous sections of this document. As described throughout this analysis, with implementation of the recommended mitigation measures, the proposed project is not expected to result in any unmitigated significant impacts.**	**XVIII-20, XVIII-30**

IV. INITIAL STUDY

Prepared by: CAJA Environmental Services

1. AESTHETICS

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

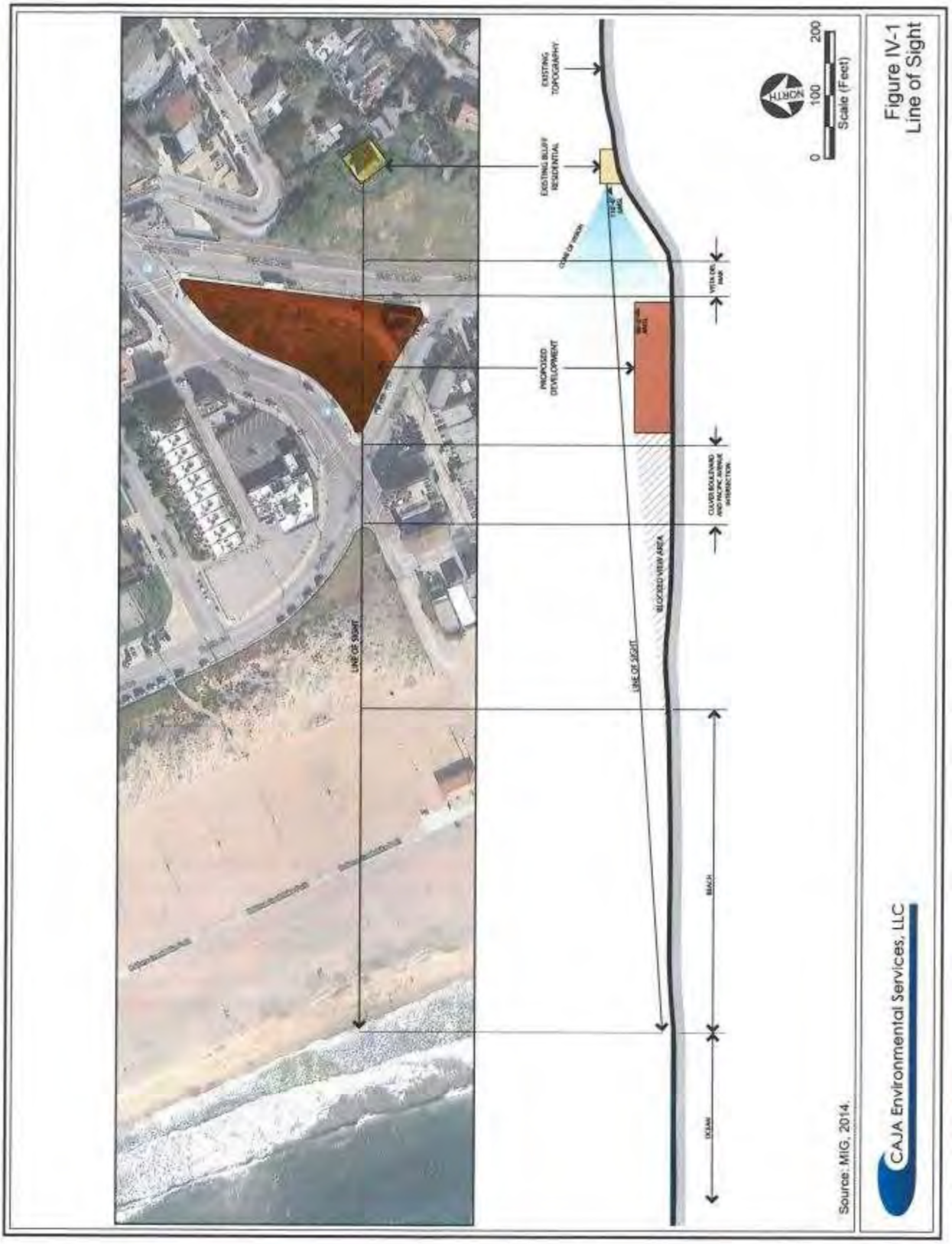
Less Than Significant Impact. A significant impact would occur if a project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista. The Project Site is located in the Playa Del Rey community of the City of Los Angeles (the "City"), in an area zoned for a mix of uses including commercial and residential uses. The Project area is characterized as a beach community consisting of single-family and multiple-family residential land uses, retail, and restaurant buildings. The residential and commercial uses surrounding the Project Site have heights ranging from one to four stories. The remainder of the Playa Del Rey community includes additional commercial and single- and multi-family residential uses.

Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area. Views in the vicinity of the Project Site are largely constrained by the existing commercial and residential structures in the area.

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private property. The City of Los Angeles CEQA Thresholds does not protect views available from private vantage points such a private offices or homes.

Limited views of the ocean are currently available from Vista Del Mar, Culver Boulevard, and Trolley Place, as well as from Montreal Street on the bluff overlooking the Project Site vicinity. Views across the Project Site from Vista Del Mar are narrow and intermittent, as residential buildings west of Vista Del Mar, Trolley Place, and Trolley way (some of which are up to three stories), and commercial and residential buildings north of Culver Boulevard, partially or fully obstruct ocean views. Some narrow views currently exist across the Project Site from Vista Del Mar and broader ocean views are available from Montreal Street. Development of the Project would obstruct the limited available views from the segment of Vista Del Mar that fronts the Project Site. Ocean views from Montreal Street would be partially obstructed, but ocean views over the proposed structure would remain available. (See also Figure IV-1, Line of Sight.) Existing, though narrow, views northwest from Trolley Place and west from Culver Boulevard would remain. Moreover, the Project would include improvements such as outdoor seating along Culver Boulevard and Trolley Place that would increase opportunities for viewing along sidewalks associated with these roadways. As such, these views would not be significantly impacted, and a less than significant impact would occur as a result of the Proposed Project.

Figure IV-1, Line of Sight



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

Potentially Significant Unless Mitigation Incorporated. A significant impact would occur only if scenic resources would be damaged or removed by a project within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site, and none of the existing vegetation on-site is considered a protected species. Additionally, the streets serving and surrounding the Project Site including Culver Boulevard, Vista Del Mar, and Trolley Place are not officially designated State or County scenic highways.[1] Culver Boulevard and Vista Del Mar are designated as scenic highways within the City's Transportation Element of the General Plan. However, as described below under "Biological Resources" and "Cultural Resources," the Project would not damage scenic resources including trees, rock outcroppings, or historic buildings, furthermore, compliance with the Mitigation Measures in this section would result in less than significant impacts with respect to scenic resources within a scenic highway.

Mitigation Measures

I-10. Aesthetics (Landscape Plan)

- All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D) and to the satisfaction of the decision maker.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

The Project area is characterized as a beach community consisting of single-family and multiple-family residential land uses, retail, and restaurant buildings. The residential and commercial uses surrounding the Project Site have heights ranging from one to four stories. The remainder of the Playa Del Rey community includes additional commercial and single- and multi-family residential uses. (See also Figures II-5 and II-6 for photographs of the uses surrounding the Project Site.)

[1] *California Department of Transportation, Landscape Architecture, Scenic Highway Program, Officially Designed Scenic Highways, website: http://www.dot.ca.gov/hq/LandArch/scenic/schwy.htm, accessed October, 2012.*

The Proposed Project would develop approximately 72 residential units and approximately 14,500 square feet of neighborhood-serving commercial uses, including 13,000 square feet of retail and 1,500 square feet of restaurant uses on a Site that is undeveloped.[2]

The Proposed Project would be four stories in height, which is comparable to the heights of some of the surrounding uses. As the Project provides neighborhood-serving commercial uses, it would further connect the Project to other surrounding uses, and community residents and patrons could walk between various uses in the community. As such, the Project would be consistent with surrounding structures in terms of height and compatibility of uses. The Proposed Project would add development to a Site that is vacant within a community that is characterized by an eclectic mix of architectural styles. The Project would reduce the appearance of the additional massing with an extensively articulated façade and various architectural details to avoid a solid, blank appearance. These elements may include use of different colors and materials, including tile roofs, wrought iron railing, stucco, wood trellises, custom storefronts, canvas awnings, cornice molding, as well as other decorative elements. The addition of the Proposed Project would add to the eclectic mix of styles in the vicinity. Further, the Project would develop an underutilized site with a high-quality development. Overall, the Proposed Project would generally be consistent with other surrounding uses in terms of both height and massing and the Project would contribute to the area's aesthetic value in a positive way. As such, there would be a less than significant impact with respect to architecture or visual character.

Mitigation Measures

I-10. Aesthetics (Landscape Plan)

- All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D) and to the satisfaction of the decision maker.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways.

---

[2] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

Light

The surrounding area is illuminated by freestanding streetlights, indoor building illumination (light emanating from the interior of structures that passes through windows), and lighting from the surrounding commercial and residential uses. Vehicle headlights from traffic on local surface streets also contribute to overall ambient lighting levels. The construction of the proposed mixed-use would create additional sources of illumination on the Project Site. However, the Project area is already illuminated, as described above. In addition, exterior lighting would be shielded and directed onto the Project Site and away from adjacent uses to the maximum extent feasible.

Though the Project would increase ambient light levels in the vicinity, the increase would not be substantial as the Project Site is located in an urbanized location that is already illuminated at night and would be compatible with surrounding uses. Further, outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties. Therefore, the Project would result in a less than significant impact with respect to light.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the Project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. Building surfaces or glass windows have the potential to create glare, particularly during the early morning and later afternoon time periods.

The Project would place buildings, including windows, on a Site that is vacant. This increase in surfaces would have the potential to reflect light onto adjacent roadways and land uses. However, the Project would limit reflective surface areas and the reflectivity of architectural materials used. As such, the Project is not expected to create unusual or isolated glare impacts. Further, glass that would be incorporated into the facades of the buildings would either be of low-reflectivity or accompanied by a non-glare coating. Thus, the Project would not result in a new source of substantial glare, and Project impacts would be less than significant.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by Project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residences, recreational/parks facilities, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive."

Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Impact Criteria for City of Los Angeles

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

Project Impacts

The Project would contain four levels within a building height of 51'-0" to the roof and 56'-0" to the parapet.[3] Buildings that are less than 60 feet in height would not be capable of producing shadows that would exceed the City of Los Angeles thresholds, described above.[4] As such, the Project would result in no impact with respect to shadows.

Mitigation Measures

I-120. Aesthetics (Light)

- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.
- All outdoor lighting shall be directed downward and shall be shielded.

I-130. Aesthetics (Glare)

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

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of

---

[3] *Oakes & Associates, Architects AIA, November 12, 2013.*
[4] *City of Los Angeles, LA CEQA Thresholds Guide, page A.3-1, 2006.*

Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[5] Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[6] The Project Site does not contain any State-designated agricultural lands or open space. Thus, the Project Site is not subject to a Williamson Act Contract.

The Project Site does not currently contain any agricultural uses, and thus, would not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project would not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)0, timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project Site is zoned [Q]C4-1VL; the 'C" meaning Commercial zone. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. As such, no impacts related to forest land or timberland would occur.

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

No Impact. The Project Site is vacant[7] and does not contain forest land, nor is it surrounded by forest land. Therefore, no impact related to the loss of forest land or conversion of forest land would occur as a result of the Proposed Project.

---

[5] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf, July 19, 2012.*

[6] *State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, October 1, 2012.*

[7] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land. No impacts related to the conversion of farmland to a non-agricultural use, or conversion of forest land to a non-forest use, would occur as a result of the Proposed Project.

3. AIR QUALITY

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

Less Than Significant Impact. Given the nature of air quality planning in Southern California, there are several plans that govern attainment strategies for criteria pollutants. The applicable air quality plan that lays out a strategy to achieve the 8-hour ozone (smog) standard is the SCAQMD's 2012 Air Quality Management Plan (AQMP). The AQMP outlines a path to attainment of the ozone standard by 2023 based on population and employment growth assumptions from the Southern California Association of Governments' (SCAG) 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The AQMP also identifies the strategy to meet the federal 24-hour $PM_{2.5}$ standard by 2014. As a result, the Proposed Project is consistent with the AQMP if it is consistent with: a) growth assumptions from the RTP/SCS and b) the rules and regulations in the Plan itself.

The proposed residential, retail, and restaurant land uses would not conflict with the growth assumptions in SCAQMD's 2012 Air Quality Management Plan. Specifically, the Proposed Project would add 72 residential units to the City of Los Angeles. The SCAG RTP/SCS forecasts a housing increase of 316,700 units from 2008 through 2035. Based on the Westchester Community Plan's estimate of 2.05 persons per household,[8] the Project could increase the City's residential population by 148 persons. The SCAG RTP forecast a population increase of 550,100 from 2008 through 2035. All the growth associated with the Project is well within parameters needed to allow attainment of ozone standard on schedule. Moreover, the Proposed Project is infill development that helps to ensure that the jobs and vehicle travel associated with this Project have less impact on air quality emissions than a project located in areas with less residential density and/or transportation infrastructure.

In addition, the Project would not conflict with the implementation of control measures or rules and regulations from the SCAQMD's 2012 AQMP. For example, the Project would be subject to Rule 403, which governs the control of fugitive dust during construction activities.

[8] *LA Planning, Demographics and Research Unit, Westchester – Playa Del Rey: Persons Per Renter Occupied Unit.*

As a result, the Proposed Project would be consistent with the SCAQMD's 2012 AQMP and would not jeopardize the region's attainment of air quality standards.

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

Potentially Significant Unless Mitigation Incorporated. A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

Construction Emissions

To illustrate a conservative estimate of Project emissions that is consistent with the Proposed Project's traffic analysis, this evaluation assumes the Proposed Project would be built over a 22-month period starting in early 2014. Construction would include six key phases that would generally be sequential and not overlap. Table IV-1 summarizes the sequence of phases and when peak emissions from each phase would occur.

Table IV-1
Project Construction Phases

Construction Phase	Duration/Start	Peak Emissions
Demolition	2 days/Winter 2013	2014
Grading	1.5 months/Winter 2013	2014
Site Preparation	0.7 months/Winter 2013	2014
Building Construction	16.7 months/Spring 2014	2014
Finishing	1.5 months/Fall 2015	2015
Paving	1.5 months/Fall 2015	2015
Source: DKA Planning, 2013.		

The analysis of daily construction emissions was prepared using the CalEEMod computer model recommended by the SCAQMD. As shown in Table IV-2, the construction of the Proposed Project would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that exceed the SCAQMD's regional thresholds. In addition, construction-related emissions of NO_2 and CO would not exceed the SCAQMD's suggested localized thresholds of significance. However, on-site PM_{10} and $PM_{2.5}$ emissions from off-road equipment would exceed the suggested thresholds of 5 lb/day and 1 lb/day of emissions, respectively, during the grading and construction phases. These thresholds reflect the close proximity of apartments directly south of the Project Site.

Proposed Mitigation Measures 3-1 through 3-10 would reduce emissions of PM_{10} and $PM_{2.5}$ below levels that would contribute to localized violations of State and federal standards. As illustrated in Table IV-3,

mitigation measures would also reduce VOC, NO_x, CO, and PM_{10} emissions. As a result, construction of the Proposed Project would neither violate any localized air quality standard nor contribute substantially to an existing or projected violation.

Table IV-2

Estimated Daily Construction Emissions – Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition						
On-Site Emissions	2	18	14	<1	1	1
Off-Site Emissions	<1	1	1	<1	<1	<1
Total Emissions	2	19	15	<1	2	1
Site Preparation						
On-Site Emissions	1	11	17	<1	2	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	1	11	17	<1	2	1
Grading						
On-Site Emissions	3	34	21	<1	7	4
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	3	34	22	<1	7	4
Building Construction						
On-Site Emissions	6	33	23	<1	2	2
Off-Site Emissions	<1	2	6	<1	1	<1
Total Emissions	6	35	30	<1	3	2
Asphalt Paving						
On-Site Emissions	2	17	11	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	2	17	12	<1	1	1
Architectural Coatings						
On-Site Emissions	12	3	2	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	12	3	3	<1	<1	<1
Maximum Regional Total	12	35	30	<1	7	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	35	34	23	<1	7	4

Localized Significance Threshold	--	91	664	--	5	1
Exceed Threshold?	N/A	No	No	N/A	Yes	Yes

LST Thresholds assume 1 acre site at 25 meters.

Source: DKA Planning, 2013 based on CalEEMod 2013.2.2 model analysis, included as Appendix A to this IS/MND. Numbers may not reconcile due to rounding.

Table IV-3
Estimated Daily Construction Emissions – Mitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition						
On-Site Emissions	<1	5	7	<1	<1	<1
Off-Site Emissions	<1	1	1	<1	<1	<1
Total Emissions	<1	6	8	<1	<1	<1
Site Preparation						
On-Site Emissions	1	11	17	<1	2	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	1	11	17	<1	2	1
Grading						
On-Site Emissions	<1	11	18	<1	1	1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	<1	11	19	<1	1	1
Building Construction						
On-Site Emissions	1	14	20	<1	<1	<1
Off-Site Emissions	<1	2	6	<1	1	<1
Total Emissions	1	16	26	<1	1	<1
Asphalt Paving						
On-Site Emissions	<1	7	12	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	<1	7	13	<1	<1	<1
Architectural Coatings						
On-Site Emissions	12	1	2	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	12	1	3	<1	<1	<1
Maximum Regional Total	12	16	26	<1	2	1

Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	12	14	20	<1	2	<1
Localized Significance Threshold	--	91	664	--	5	1
Exceed Threshold?	N/A	No	No	N/A	No	No
LST Thresholds assume 1 acre site at 25 meters. *Source: DKA Planning, 2013,based on CalEEMod 2013.2.2 model analysis, included as Appendix A to this IS/MND.*						

Mitigation Measures

III-10. Air Pollution (Demolition, Grading, and Construction Activities)

- Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes.
- All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.
- Ground cover in disturbed areas shall be replaced as quickly as possible.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.
- Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications.

- All diesel-powered construction equipment shall meet USEPA Tier 3 or higher emissions standards according to the following:
    - January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.
- All diesel-powered construction equipment shall use CARB Level 3 or higher diesel particulate filters with oxidation catalysts that reduce emissions by 20 percent or more.

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupation. Stationary area source emissions are generated by the consumption of natural gas and landscape maintenance. Mobile emissions are generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Project has been prepared utilizing the CalEEMod computer model recommended by the SCAQMD. During the long-term operations of the development, the Proposed Project would not exceed any of the SCAQMD's recommended regional thresholds of significance. As shown on Table IV-4, the Project's long-term air quality impacts to the region result primarily from motor vehicles that access the Project Site. The Project could add up to 1,163 more vehicle trips to and from the area on its peak day, with up to 147 vehicles entering and exiting the Project Site in the peak afternoon hour.[9] However, regional operational emissions would not exceed SCAQMD significance thresholds, and would result in a less than significant impact.

[9] *Hirsch/Green Transportation Consulting, "Supplemental Traffic Impact Analyses for Revisions to Approved Residential and Commercial Mixed-Use Project at 138 Culver Boulevard in the Playa del Rey Community of the City of Los Angeles," September 30, 2013.*

Table IV-4
Estimated Daily Operations Emissions

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	2	<1	6	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	5	12	52	<1	7	2
Total Operations	7	13	58	<1	7	2
SCAQMD Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

Source: DKA Planning, 2013, based on CalEEMod 2013.2.2 model analysis, included as Appendix A to this IS/MND. Numbers may not reconcile due to rounding.

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

Potentially Significant Unless Mitigation Incorporated. The Project would not contribute cumulatively considerable net increases in any criteria pollutant emissions. Specifically, growth associated with the Project would be consistent with assumptions from the region's 2012 AQMP that addresses cumulative regional emissions of ozone precursors. Further, the Project would comply with all applicable control measures, rules and regulations from the 2012 AQMP.

On a local level, the Proposed Project would not result in a significant net increase of criteria pollutant emissions with implementation of Mitigation Measures 3-1 through 3-10. These measures would help reduce construction-related emissions below the SCAQMD's local thresholds of significance. While there are other development projects in the area that are slated for potential construction during the same two-year period, they would be required to meet localized thresholds of significance to avoid any potential cumulative impacts on local sensitive receptors in the Playa del Rey community. Future development that could contribute to cumulative localized impacts would be required to address LST thresholds and perform dispersion modeling to demonstrate that potential violations of health standards would not occur.

Mitigation Measures

III-10. Air Pollution (Demolition, Grading, and Construction Activities)

- Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes.
- All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.
- Ground cover in disturbed areas shall be replaced as quickly as possible.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Heavy-duty equipment operations shall be suspended during first and second stage smog alerts.
- Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications.
- All diesel-powered construction equipment shall meet USEPA Tier 3 or higher emissions standards according to the following:
    - January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.
- All diesel-powered construction equipment shall use CARB Level 3 or higher diesel particulate filters with oxidation catalysts that reduce emissions by 20 percent or more.

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

Less Than Significant Impact. The Proposed Project would not contribute to localized violations of the CO or NOx standards, as it would not result in emission levels that exceed the LST thresholds set by the SCAQMD. However, emissions of PM_{10} and $PM_{2.5}$ could result in local exceedances of the applicable standards at adjacent receptors near the site. As shown in Table IV-3, mitigation measures 3-1 through 3-10 would reduce emissions of PM_{10} and $PM_{2.5}$ concentrations below LST thresholds. As a result, the Proposed Project would not expose sensitive receptors to substantial criteria pollutant concentrations.

As for exposure of sensitive receptors to toxic air contaminants, 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.[10] The Proposed Project is not anticipated to generate a substantial number of daily truck trips. Based on the limited activity of TAC sources, the Proposed Project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Proposed Project would not include any of these potential sources. It is expected that the Proposed Project would not release substantial amounts of TACs, and no significant impact on human health would occur.

Localized air pollution impacts from incompatible land uses can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes.[11] None of the uses near the Project Site are sources that would be incompatible with Proposed Project.

Finally, the Proposed Project would locate up to 72 residential units that could house approximately 148 new residents in the area. However, these residents would not be exposed to substantial pollution concentrations for three key reasons. First, there are no substantial upwind sources of TACs or localized criteria pollutants. Second, the traffic volumes on nearby Culver Boulevard and Vista del Mar would not generate high enough concentrations of CO because of the existing and projected congestion levels and the substantial dispersion of CO emissions from these downwind streets away from the Project Site. Finally, the average temperatures in this temperate beachside location are not conducive to CO hotspots.

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

No Impact. The proposed development of the mixed-use project would introduce new retail, restaurant, and residential uses to the area, but would not result in activities that create objectionable odors. It would

---

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

[11] *CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.*

not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD's Rule 402 that governs nuisances can address any unpleasant odors from the future restaurant uses. As a result, no significant odor impacts are expected from the Proposed Project.

4. BIOLOGICAL RESOURCES

The following section is based on the Biological Resource Assessment, prepared by Cooper Ecological Monitoring, Inc., dated September 17, 2012, and included as Appendix B to this IS/MND.

Methods

Analysis of the biological resources associated with the Project Site began with a review of relevant literature followed by a field survey. The literature review provides a baseline from which to evaluate the biological resources potentially present. Several environmental documents and databases researching topics such as topography, soils data, species occurrences, and local/regional policies were also reviewed.

The primary objective of the field survey was to document the existing conditions on the Project Site and to determine the potential presence of sensitive biological resources that may be subject to impacts as a result of the Proposed Project. The reconnaissance-level field survey was conducted by biologist Daniel S. Cooper on September 6, 2012, from 1:00 PM to 2:00 PM. The weather conditions were warm (81 degrees F), with no wind and clear skies. During this visit, Mr. Cooper walked around the Project Site noting all flora and fauna visible.

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

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS).

Regulatory Background

Federal Endangered Species Act

The USFWS administers the Federal Endangered Species Act (FESA). FESA provides a process for listing species as either threatened or endangered, and methods of protecting listed species. FESA defines as "endangered" any plant or animal species that is in danger of extinction throughout all or a significant portion of its known geographic range. A "threatened" species is a species that is likely to become endangered. A "proposed" or "candidate" species is one that has been officially proposed by the USFWS

for addition to the federal threatened and endangered species list. The USFWS has delineated large areas as suitable habitat for certain threatened and endangered species to aid in the recovery efforts of the respective species. These areas are classified as "Critical Habitat" and any federal activity proposed in these areas are subject to additional scrutiny by USFWS.

California Endangered Species Act

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy; a threatened species as one present in such small numbers throughout its range that it is considered likely to become an endangered species in the near future in the absence of special protection or management; and a rare species as one present in such small numbers throughout its range that it may become endangered if its present environment worsens. California Species of Special Concern (SSC) status applies to animals not listed under the FESA or CESA, but which nonetheless are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their presence currently exist. This designation does not provide specific legal protection, but signifies that these species are recognized as vulnerable by the California Department of Fish and Game (CDFG).

California Native Plant Society

The California Native Plant Society (CNPS) is a statewide resource conservation organization that has developed an inventory of California's sensitive plant species. This inventory is a summary of information on the distribution, rarity, and endangerment of California's vascular plants. This rare plant inventory consists of four lists. CNPS presumes that Rank 1A plant species are extinct in California because they have not been seen in the wild for many years. CNPS considers Rank 1B plants as rare, threatened, or endangered throughout their range. Rank 2 plant species are considered rare, threatened, or endangered in California, but are more common in other states. Plant species on lists 1A, 1B, and 2 meet CDFG criteria for endangered, threatened, or rare listing. Plant species for which CNPS requires additional information to properly evaluate their status are included on Rank 3. Rank 4 plant species are those of limited distribution in California whose statewide susceptibility to threat is considered low at the current time. However, they are typically treated as having special status species by regulatory agencies, as we have here.

For the purposes of this analysis, the term "special-status species" refers to all species formally listed as candidate, threatened, and/or endangered under FESA or CESA; Federal Species of Concern; California Species of Special Concern and California Fully Protected Species; and CNPS listed species. Federal and state listed threatened or endangered species, and California Fully Protected Species are legally protected under the FESA and CESA. Additional species considered to have special status have no direct legal protection, but require a significance analysis under the CEQA guidelines and are tracked by the California Diversity Database (CNDDB).

Existing Conditions

Vegetation

Located in a highly developed urban area, the Project Site itself supports very little vegetation. Vegetation observed at the Site consisted exclusively of plant species that are non-native and often invasive. The most common plant recorded at the Site was telegraph weed (*Heterotheca grandiflora*), which was present in small numbers, mainly at the periphery of the lot. Also observed at the site were small numbers of the following plant species, which are typical of any urban vacant lot in southern California: Iceplant (*Carpobrotus* sp.), Bermuda grass (*Cynodon dactylifera*), spurge (*Chamaesyce* cf. *serpens*), nightshade (*Solanum* cf. *nigrum*), South American horseweed (*Conyza bonariensis*), common sowthistle (*Sonchus oleraceus*), lance-leaf plantain (*Plantago lanceolata*), puncture vine (*Tribulus terrestris*), amaranth (*Amaranth* sp.), tecolote (*Centaurea melitensis*), wild oat (*Avena* sp.), cheeseweed (*Malva parviflora*), and common knotweed (*Polygonum arenastrum*).

Due to extreme past disturbance, the plant community of the Project Site could not be identified. The native herb layer is absent from the entire Project Site, and from much of the surrounding urban landscape. Some natural dune and bluff scrub vegetation is located on parcels near the site (e.g., Playa del Rey bluffs to south, "Toes Beach" to northwest), but this vegetation is not present on the Site itself.

Wildlife

During the survey conducted on September 6, 2012, wildlife activity was observed to be very low on the Project Site itself. Mr. Cooper observed approximately seven holes in the soil at the Site, each about 6 cm in diameter, which were judged to be abandoned mammal burrows. Though the burrows appeared not to have been used for some time, they indicate that a small population of California ground squirrels has occupied the Project Site in the recent past. Insects observed at the Site included at least one colony of (native) harvester ants, and three small skippers that appeared to be *Hylephila phyleus*, a species commonly encountered in urban areas in southern California. No mollusks or other invertebrates were observed within the Project Site. No herptiles or birds were observed in or around the Project Site during the survey.

Special Status Species

Plants

Table IV-5 lists the plant species recorded as occurring in the Venice quadrangle (USGS), according to CNDDB. The habitat requirements for each species listed was assessed with respect to the Project Site and the likelihood of species occurrence on the site is presented in the table, based on descriptions in Calflora (www.calflora.org) and Consortium of California Herbaria (2012). Many of the plant species below are restricted to unique habitats that occur within coastal areas of southern California. These include southern dune scrub, southern coastal salt marsh and ephemeral vernal pools. The Project Site does not exhibit features of any of these special-status habitats.

Because of the disturbed nature of the Project Site, none of the sensitive plant species known from the area would be expected to occur. Based on the Site visit, and the lack of any unique habitats (meadows, vernal pools, coastal bluff scrub, coastal dunes) in the vicinity of the Project Site, none of these species would be expected to occur in the Project Site, despite being present elsewhere in the coastal strand of the Venice

quadrangle (USGS).

Table IV-5

Potentially Occurring Special-Status Plant Species

CNDDB Code	Latin Name Common Name	Federal Status	CA Status	Potential to occur in project area
PDAST20095	*Chaenactis glabriuscula var. orcuttiana* Orcutt's pinchusion	None	1B.1	None; occurs in coastal bluff scrub and coastal dunes
PDAST4ROP4	*Centromadia parryi ssp. Australis* southern tarplant	None	1B.1	None; occurs in wetlands
PDAST5L0A1	*Lasthenia glabrata ssp. Coulteri* Coulter's goldfields	None	1B.1	None; occurs in salt marsh, playas, vernal pools, and valley and foothill grasslands
PDBRA10020	*Dithyrea maritime* beach spectaclepod	None	Threatened; 1B.1	None; occurs in coastal dunes
PDCHE091Z0	*Chenopodium littoreum* Coastal goosefoot	None	1B.2	None; occurs in coastal dunes
PDFAB0F7B1	*Astragalus pycnostachyus var. lanosissimus* Ventura Marsh milkvetch	Endangered	Endangered; 1B.1	None; occurs within reach of high tide, near seeps on sandy bluffs, and in coastal salt marsh
PDFAB0F8R2	*Astragalus tener var. titi* Coastal dunes milk-vetch	Endangered	Endangered; 1B.1	None; occurs in coastal dunes and coastal bluff scrub
PDHYD0C510	*Phacelia stellaris* Brand's star phacelia	Candidate	1B.1	None; occurs in coastal scrub and coastal dunes
PDPGN040J1	*Choizanthe parryi var. Fernandina* San Fernando Valley spineflower	Endangered	Endangered; 1B.1	None; occurs in coastal scrub
PDPLM0C0Q0	*Navarretia prostrate* Prostrate vernal pool navarretia	None	1B.1	None; occurs in vernal pools and alkaline soils in valley/foothill grasslands
PDROS1B120	*Potentilla multijuga* Ballona cinquefoil	None	1A	None; occurs in brackish meadows and seeps

CNDDB = California Diversity Database
Status Code: http://www.cnps.org/cnps/rareplants/ranking.php
1A = Plant presumed extinct in California
1B = Plants Rare, Threatened, or Endangered in California and Elsewhere
Threat Rank – an extension added to the Status and ranges from 1 (most endangered) to 3 (least endangered)
Source: Cooper Ecological Monitoring, 9-17-12.

Plant Communities

Two sensitive plant communities are listed for the Venice quadrangle (USGS) by CNDDB, Southern Dune

Scrub and Southern Coastal Salt Marsh (see Table IV-6). However, the habitat at the Project Site itself is highly disturbed and not recognizable as a plant community. During the Site visit on September 6, 2012, no features of southern dune scrub or southern coastal salt marsh habitat were noted within the Project Site.

Table IV-6

Potentially Occurring Special-Status Plant Communities

Element Code	Name	Status	Occurrence
CTT21330CA	Southern Dune Scrub	None	Not present
CTT52120CA	Southern Coastal Salt Marsh	None	Not present
Source: Cooper Ecological Monitoring, 9-17-12.			

Wildlife

Table IV-7 lists the special-status wildlife species recorded as occurring within the Venice quadrangle (USGS), according to CNDDB. The habitat requirements for each species listed were assessed with respect to the Project Site, and the likelihood of species occurrence on the Site is presented in the table.

The Project Site itself contains little suitable habitat for wildlife, and the perimeter of the Site is largely occupied by residential and commercial urban development. No sensitive wildlife species would be expected to occur on the Project Site.

Table IV-7

Potentially Occurring Special-Status Wildlife Species

CNDDB Code	Latin Name Common Name	Federal Status	CA Status	DFG Status	Potential to Occur in Project Area
ABNFC01021	Pelecanus occidentalis Californicus California brown pelican	Delisted	Delisted	FP	None; inappropriate habitat
ABNME03041	Laterallus jamaicensis coturniculus California black rail	None	Threatened	FP	None; inappropriate habitat (no salt marsh or wetland features present)
ABNNB03031	Charadrius alexandrinus Nivosus western snowy plover	Threatened	None	SSC	None; inappropriate habitat (no beach or wetland at site).
ABNNM08103	Sternula antillarum browni California least tern	Endangered	Endangered	FP	None; inappropriate habitat (no beach strand or coastal estuary at site).
ABNSB10010	Athene cucularia burrowing owl	None	None	SSC	None; project site of insufficient size to support this species
ABPBJ08081	Polioptila californica californica 'coastal California gnatcatcher	Threatened	None	SSC	None; inappropriate habitat (no coastal sage scrub features present)

ABPBX99015	Passerculus sandwichensis Beldingi Belding's savannah sparrow	None	Endangered	-	None; inappropriate habitat (no salt marsh features present).
AMABA01104	Sorex ornatus salicornicus southern California saltmarsh shrew	None	None	SSC	None; inappropriate habitat
AMAFD01042	Perognathus longimembris Pacificus Pacific pocket mouse	Endangered	None	SSC	None; inappropriate habitat
AMAFF11035	Microtus californicus stephensi south coast marsh vole	None	None	SSC	None; inappropriate habitat
ARAAD02030	Emys marmorota western pond turtle	None	None	SSC	None; inappropriate habitat (no wetland features present).
IICOL02101	Cicindela hirticollis gravida sandy beach tiger beetle	None	None	-	None; inappropriate habitat
IICOL02121	Cicindela senilis frosti senile tiger beetle	None	None	-	None; inappropriate habitat
IICOL4W010	Onychobaris langei Lange's El Segundo Dune weevil	None	None	-	None; inappropriate habitat
IICOL51021	Trigonoscuta dorothea dorothea Dorothy's El Segundo Dune weevil	None	None	-	None; inappropriate habitat
IIDIP17010	Brennania belkini Belkin's dune tabanid fly	None	None	-	None; inappropriate habitat
IILEM0R390	Eucosma hennei Henne's eucosman moth	None	None	-	None; inappropriate habitat
IILEM2X090	Carolella busckana Busck's gallmoth	None	None	-	None; inappropriate habitat
IILEP84030	Panoquina errans wandering (= saltmarsh) skipper	None	None	-	None; inappropriate habitat
IILEPG201B	Euphilotes battoides allyni El Segundo blue butterfly	Endangered	None	-	None; inappropriate habitat
IILEPP2010	Danaus plexippus monarch butterfly	None	None	-	None; inappropriate habitat
IIMGASJ7040	Tryonia imitator mimic tryonia (= California brackishwater snail)	None	None	-	None; inappropriate habitat

CNDDB = California Diversity Database

SSC = Species of Special Concern (State of California), FP (Proposed for Federal Listing)

Source: Cooper Ecological Monitoring, 9-17-12.

Conclusion

No sensitive plant species were observed and none are expected to occur at the Project Site.

No sensitive plant communities were observed and none are expected to occur at the Project Site.

No sensitive wildlife species were observed on Site. Given the lack of suitable habitat, none are expected to occur within the limits of the Project Site. Therefore, no mitigation measures are suggested.

No candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS are expected to occur on the Project Site. Therefore, no impact on sensitive or special status species would occur as a result of the Proposed Project.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or USFWS were to be adversely modified without adequate mitigation.

The Project Site is a flat, barren dirt lot located at sea level, approximately 300 meters from the Pacific Ocean coastline. The soil where the lot is located is mapped as "beach deposits,"[12] but due to an apparent history of grading, the soil present is highly disturbed. No riparian or wetland vegetation was observed at the Project Site.

The Project Site is not within any Significant Ecologic Area (SEA) of the City.[13] The nearest SEA is the Coastal Habitant at the Pacific Ocean and the County's Ballona Creek. The Project site is not within a riparian habitat.[14]

Therefore, no impact to riparian or sensitive natural community would occur.

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

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation.

Regulatory Setting

Jurisdictional Waters and Wetlands

Impacts to natural drainage features and wetland areas are regulated by the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and CDFG. USACE has jurisdiction of waters demarcated by an ordinary high water mark (OHWM) under the Federal Clean Water Act (CWA), Section 404. Additionally, USACE has jurisdiction of wetlands as defined by the USACE

---

[12] *California Department of Conservation, Geologic Map of the Long Beach 30' x 60' Quadrangle, 2003: ftp://ftp.consrv.ca.gov/pub/dmg/rgmp/Prelim_geo_pdf/lb_geol-dem.pdf*

[13] *Navigate LA, Significant Ecologic Area layer: http://navigatela.lacity.org/index01.cfm, September 28, 2012.*

[14] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian layer, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed September 28, 2012.*

Wetlands Delineation Manual. RWQCB has jurisdiction of any discharge into waters of the state under the Section 401 of the CWA and under the Porter-Cologne Water Act. CDFG has additional jurisdiction of state waters and the associated vegetation under CFG Code, Section 1600.

Project Impacts

No potentially jurisdictional water or wetland would be impacted by the Proposed Project and no avoidance measures or mitigation measures are recommended.

No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on the Project Site.[15] The nearest wetlands are the estuarine and marine of the Pacific Ocean, a freshwater pond at Del Rey Lagoon Park, and freshwater emergent at Ballona Creek.

Therefore, the Project would not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act, and no impact to federally protected wetlands would occur.

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

No Impact. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites.

Regulatory Setting

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects all common wild birds found in the United States except the house sparrow, European starling, feral pigeon, and resident game birds such as pheasant, grouse, quail, and wild turkey. Resident game birds are managed separately by each state. MBTA makes it unlawful for anyone to kill, capture, collect, possess, buy, sell, trade, ship, import, or export any migratory bird including feathers, parts, nests, or eggs. The California Fish and Game Code (CFG Code) is administered by CDFG. There are particular sections of the CFG Code that are applicable to natural resource management. For example, Section 3505 states it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird that is protected under the MBTA. The code further protects all birds of prey, such as hawks and owls and their eggs and nests from any form of take.

---

[15] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands layer, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed September 28, 2012.*

Project Impacts

Nesting Birds

No nesting bird habitat is found on the Project Site, and the vegetation adjacent to the Project Site contains limited suitable habitat for tree and shrub-nesting avian species protected under the MBTA and CDFG Code. Therefore, the Project would have no impact with respect to nesting birds.

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

No Impact. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. No native shrubs or shrubby trees are found in the Project Site, nor at the perimeter of the Site. No protected biological resources or tree species, such as oak trees, currently exist on the Site. Therefore, no impact would occur with respect to local policies or ordinances protecting or preserving biological resources.

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

No Impact. A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. No USFWS-designated Critical Habitat occurs near the Project Site; Critical Habitat for several sensitive plants is found 3-5 kilometers north and east of the Site.

No Critical Habitat for any plant or animal species is known from the Project Site, and none is likely to be designated or identified. Therefore, no avoidance measures or mitigation measures are recommended for species protected by a Critical Habitat designation.

No locally designated natural communities are known to occur on or adjacent to the Project Site. There are no known locally designated natural communities on the Project Site or in the vicinity. The Project Site is not part of any Critical Habitat as mapped by the U.S. Department of Fish and Wildlife Services[16] and is also not within any Significant Ecologic Area (SEA) of the City.[17] The Project Site is not within a Habitat Conservation Plan (HCP) or Natural Conservation Community Plan (NCCP).[18] The nearest mapped HCP or NCCP is around the Palos Verdes Hills peninsula.

---

[16] *U.S Department of Fish and Wildlife Service: http://criticalhabitat.fws.gov/crithab/flex/crithabMapper.jsp?, accessed September 28, 2012.*

[17] *Navigate LA, Significant Ecologic Area layer: http://navigatela.lacity.org/index01.cfm, September 28, 2012*

[18] *California Department of Fish and Game, map with Natural Resources – HCP and NCCP layer selected: http://imaps.dfg.ca.gov/maps/bios_public/, accessed September 28, 2012.*

Due to the Site's proximity to the Pacific Ocean, it is within the Calvo Exclusion Zone, the Coastal Zone Commission Authority, and the Dual Jurisdictional Coastal Zone.[19] However, these are not related to a habitat conservation plan.

Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan.

5. CULTURAL RESOURCES

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

This section is based on the following report: 6917 Vista Del Mar, Los Angeles, Historic Resource Report, prepared by Galvin Preservation Associates, September 2012 {included as Appendix C to this IS/MND).

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

Regulatory Setting

National Register of Historic Places

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

> A. Associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B. Associated with the lives of persons significant in our past; or

[19] *ZIMAS, City of Los Angeles, Department of City Planning, Parcel Profile Report.*

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Yield, or may be likely to yield, information important in prehistory or history.

California Register of Historical Resources

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

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or

2. It is associated with the lives of persons important to local, California, or national history; or

3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

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

1. The survey has been or will be included in the State Historic Resources Inventory;

2. The survey and the survey documentation were prepared in accordance with office [California Office of Historic Preservation (OHP)] procedures and requirements;

3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and

4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

State Office of Historic Preservation Survey Methodology

The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.

2. Determined eligible for listing in the National Register or the California Register.

3. Appears eligible for listing in the National Register or the California Register through survey evaluation.

4. Appears eligible for listing in the National Register or the California Register through other evaluation.

5. Recognized as historically significant by local government.

6. Not eligible for listing or designation as specified.

7. Not evaluated or needs re-evaluation.

City of Los Angeles Cultural Heritage Ordinance

The Ordinance states that: "For purposes of this article, a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age."

Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines

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

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

- Demolition of a significant resource;

- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;

- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or

- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Secretary of the Interior Standards

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Project Impacts

The Project Site is currently undeveloped. However, one vacant commercial building at the corner of Vista Del Mar and Trolley Avenue was previously demolished. That building is the subject of the analysis below.

National Register Eligibility

Criterion A

The property was evaluated for its potential significance as part of a historical trend that made a significant contribution to the broad patterns of our history. The property was therefore considered for its contribution to the history and development of Playa Del Rey.

Playa Del Rey was largely undeveloped until the mid-1920s. In 1924, the Dickinson and Gillespie Company constructed a building at 200 Culver, began to plan some neighborhoods, helped to develop a newspaper, and installed water mains, gas lines, sewers, curbs, sidewalks, and roadways in the area. However, very little remains of the early development of Playa Del Rey.

The subject building was moved to the Project Site in 1958. Thus, it is not associated with the early development of the area by the Beach Land Company or the Dickinson and Gillespie Company. During the late 1950s and early 1960s, Playa Del Rey was a popular location for surfers and many multi-family buildings were constructed. However, the subject building on the Project Site did not figure prominently in the post-war development patterns of Playa Del Rey. Therefore, the building is not significant under Criterion A.

Criterion B

The property was evaluated for its potential association with significant persons. The historic ownership of the building is unclear. According to the building permit record, the building was moved to its current location in 1958 by Charles R. Escallier. However, according to the Los Angeles County Tax Assessor's Office, the owners of the property between 1957 and 1960 were Hans F. and Edel Mueller, Hanson Homes. Inc. Although the associations these individuals have with the subject building is unclear, these individuals and this company were researched to determine if they were significant. No information was found on the Muellers or Hanson Homes suggesting they were significant. Escallier appears to have been a successful real estate investor. Although he owned property throughout greater Los Angeles, he does not appear to have been significant in the context of real estate development. Therefore, the property does not appear to be significant under Criterion B for an associated with the lives of persons significant in our past.

Criterion C

The property was evaluated for its potential to embody distinctive characteristics of a type, period, or method of construction, or representing the work of a master, possessing high artistic values, or representing a significant and distinguishable entity whose components lack individual distinction.

The building at 6917 Vista Del Mar was apparently constructed in 1946. The building permit for the original construction was not found in association with the original address (16225 Ventura Boulevard) or the current address (6917 Vista Del Mar). No historic photographs were found of the building at either location, so the original appearance of the building is unknown. It appears to have been a typical example of a commercial building constructed in the 1940s. The hipped roof and L-shaped plan suggest that it had a residential quality, which would not have been unusual given the fact that it was used as a real estate office. At any rate, in its present condition, it does not embody the distinctive characteristics of a type, period, or method, of construction. As the original building permit was not found, it was not possible to determine whether a master architect designed the building. Based upon its appearance, it does not appear to have been the work of a master. Therefore, it is not significant under this aspect of Criterion C.

The possession of high artistic values generally refers to the articulation of a particular concept of design to such an extent that it expresses an aesthetic ideal. The subject building is a typical example of a commercial building from its period and does not express an aesthetic ideal or design concept to a greater extent than any other property of its type. Furthermore, the building has been substantially altered. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. Since the subject property is not part of a historic district and is being evaluated individually, this aspect of Criterion C does not apply.

Overall, the building does not appear to be significant under Criterion C.

Criterion D

Criterion D was not considered as part of the historic resources report, as it generally applies to archaeological resources. There is no reason to believe that the property has yielded, or will yield, information important to the prehistory or history of the local area, California, or nation.

Integrity

The building was examined against the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. As described above, the building was moved from its original location at 16225 Ventura Boulevard in 1958. Therefore, it does not retain its integrity of location. The building has remained at its current location since that time. Since the late 1950s, the setting of the building has changed. In terms of the immediate setting, the buildings that once occupied the triangular block on which the subject building is located have been removed. The block is now vacant, with the exception of the subject building. The broader setting of Playa Del Rey is mostly characterized by low-rise multi-family residential buildings constructed in the 1950s through the 1980s. The integrity of the setting has been diminished by the removal of the surrounding buildings and construction of newer buildings, but remains sufficiently intact. Alterations to the building in the 1970s were substantial. Although the original roof form

is visible, the building has essentially been enveloped by additions. As such, the integrity of design, workmanship, and materials has been lost. The building no longer retains its integrity of feeling, as it no longer feels like a real estate office from the 1940s or 50s. It now feels like a restaurant from a later period due to its alterations. As the building is not significant under Criteria A or B, there is no relevant association to evaluate.

Conclusion

The building at 6917 Vista Del Mar does not appear to be significant under any of the four established National Register criteria. Regardless of any significance the building may or may not have, the building is ineligible for listing in the National Register because it lacks sufficient integrity.

California Register Eligibility

The California Register was modeled on the National Register. The criteria for eligibility for listing in the California Register are virtually the same as the National Register. Therefore, the property is ineligible for listing in the California Register for the same reasons noted above.

Los Angeles Historic-Cultural Monument Eligibility

The criteria for eligibility for designation as a Los Angeles Historic-Cultural Monument are similar to the National and California Registers. Therefore, the property is ineligible for designation as a Monument for the same reasons noted above.

Historic Resources Conclusion

The historic resources report prepared for the building located on the Project Site concluded that the building is ineligible for listing at the national, state, or local levels because it lacks historical or architectural significance, as well as physical integrity. As such, the development of the Proposed Project would have no impact with respect to historic resources.

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

Potentially Significant Unless Mitigation Incorporated. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles, and has been partially disturbed by past development activities such as grading to construct the structure that previously existed on the Project Site. In addition, the presence of shallow groundwater makes it unlikely that any archaeological resources would be discovered during construction activities. Nevertheless, there is still the remote possibility that archaeological resources could be discovered.

Therefore, implementation of the Mitigation Measures provided below, would ensure that impacts related to archaeological resources are less than significant.

Mitigation Measure

V-20. Cultural Resources (Archaeological)

- If any archaeological materials are encountered during the course of project development, all further development activity shall halt and:
- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

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

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in the Playa Del Rey community of the City of Los Angeles, and a portion of the Site has been disturbed by past development activities. In addition, the presence of shallow groundwater makes it unlikely that any paleontological resources would be discovered during construction activities. However, there is a remote possibility that unsuspected vertebrate fossil remains could exist below the ground and could be encountered during excavation necessary or grading. Therefore, implementation of the Mitigation Measures provided below, would ensure that impacts related to archaeological resources are less than significant.

Mitigation Measure

V-30. Cultural Resources (Paleontological)

- If any paleontological materials are encountered during the course of project development, all further development activities shall halt and:
    - The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
    - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
    - The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
    - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

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

Potentially Significant Unless Mitigation Incorporated. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles, and has been partially disturbed by past development activities. Any surficial human remains that may have existed at one time have likely been previously unearthed or disturbed. In addition, the presence of shallow groundwater makes it unlikely that any human remains would be discovered during construction activities. Nevertheless, there is still the remote possibility that human remains could be discovered. Therefore, implementation of the Mitigation Measures, provided below, would ensure that impacts related to the discovery of human remains are less than significant.

Mitigation Measure

V-40. Cultural Resources (Human Remains)

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
    - Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033. 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
    - The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
    - The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
    - The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
    - If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
    - If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.
- Discuss and confer means the meaningful and timely discussion careful consideration of the views of each party.

6. GEOLOGY AND SOILS

This section is based on the Geotechnical Investigation, prepared by Geocon West, Inc., dated December 1, 2009, and included as Appendix D to this IS/MND.

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

Less Than Significant Impact. The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Division of Mines and Geology (CDMG) for the Alquist-Priolo Earthquake Fault Zone Program (Hart, 1999). By definition, an active fault is one that has had surface displacement within Holocene time (about the last 11,000 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years), but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive.

The Site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Site during the design life of the proposed development is considered low. The Site, however, is located in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The closest active fault to the Site is the Palos Verdes Fault Zone located 4.8 miles southwest of the Site. Other nearby active faults include the Newport-Inglewood Fault Zone, the Santa Monica Fault, the Malibu Coast Fault, and the Hollywood Fault located 5.6 miles east, 6.1 miles north, 7.6 miles northwest and 9.2 miles north-northeast of the Site, respectively. The active San Andreas Fault Zone is located approximately 43 miles northeast of the Site.

The closest potentially active faults to the Site are the Charnock Fault and the Overland Fault located approximately 3.4 miles east, and 4.5 miles east of the Site, respectively.

Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 M_w 5.9 Whittier Narrows Earthquake, and the January 17, 1994 M_w 6.7 Northridge Earthquake were a result of movement on the buried thrust faults. These thrust faults are not exposed at the surface and do not present a potential surface fault rupture hazard; however, these active features are capable of generating future earthquakes.

Conclusion

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and is approximately 4.8 miles from the nearest fault.[20] Further, the City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would have a less than significant impact related to ground rupture from known earthquake faults.

b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

Potentially Significant Unless Mitigation Incorporated. As with all of Southern California, the Site has experienced historic earthquakes from various regional faults. The seismicity of the region surrounding the Site was formulated based on research of an electronic database of earthquake data. The epicenters of recorded earthquakes with magnitudes equal to or greater than 4.0 within a radius of 60 miles of the site are

[20] *Geotechnical Investigation, Geocon West, page 5.*

depicted in the California Seismicity Map (Appendix D., Geotechnical Investigation) a number of earthquakes of moderate to major magnitude have occurred in the Southern California area within the last 100 years. A partial list of these earthquakes is included in Appendix D.

The Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements (formally provided as Mitigation Measure 6-1) would minimize the potential to expose people or structures to substantial risk, loss, or injury. Therefore, impacts related to seismic ground shaking would be less than significant.

Mitigation Measure

VI-10. Seismic

- The design and construction of the Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

VI-50. Geotechnical Report

- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
- The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

Table IV-8
List of Historic Earthquakes

Earthquake (Oldest to Youngest)	Date	Magnitude	Distance to Epicenter	Direction to Epicenter
Lake Elsinore area	May 15, 1910	6.0	63	ESE
San Jacinto-Hemet area	April 21, 1918	6.8	84	E
Near Redlands	July 23, 1923	6.3	69	E
Long Beach	March 10, 1933	6.4	36	SE
Tehachapi	July 21, 1952	7.5	79	NNW
San Fernando	February 9, 1971	6.6	31	N
Whittier Narrows	October 1, 1987	5.9	22	ENE
Sierra Madre	June 28, 1991	5.8	33	NE
Big Bear	June 28, 1992	6.4	94	ENE
Northridge	January 17, 1994	6.7	18	N

Source: Geocon West, December 1, 2009.

c) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?

Potentially Significant Unless Mitigation Incorporated. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure.

Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction. According to the State of California Seismic Hazard Zone, Venice Quadrangle Map (1999) and the City of Los Angeles Seismic Safety Element (1996) the Project Site is located within an area identified as having

a potential for liquefaction.[21, 22]

Liquefaction analysis of the soils underlying the Site was performed using the spreadsheet template LIQ2_30.WQ1 developed by Thomas F. Blake (1996). This program utilizes the 1996 NCEER method of analysis. The liquefaction potential evaluation was performed by assuming a conservative historic high groundwater table of 5 feet, a magnitude 6.6 earthquake, and a peak horizontal acceleration of 0.55g (DBE). This semi-empirical method is based on a correlation between values of Standard Penetration Test (SPT) resistance and field performance data. The liquefaction analyses for Borings 1 and 2 indicate that the soils below the lowest subterranean level would be prone to less than 1 inch of total settlement during DBE ground motion, respectively.

The grading and foundation recommendations from the Geotechnical Investigation are intended to mitigate the potential for settlement, while the dewatering recommendation would mitigation the potential for liquefaction (see pages 11 to 32 of the Geotechnical Investigation, included as Appendix D to this IS/MND, for the full list of recommendations). In addition, compliance with Mitigation Measure 6-2 would reduce the Project's impacts with respect to liquefaction to less than significant.

Mitigation Measure

6-2 VI-10. Seismic

- The design and construction of the Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

VI-50. Geotechnical Report

- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.
- The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

---

[21] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 138 Culver address, website: http://zimas.lacity.org/, accessed September 28, 2012.*

[22] *Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed September 28, 2012.*

VI-70. Liquefaction Area

- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The project shall comply with the Uniform Building Code Chapter 18. Division1 Section1804.5 Liquefaction Potential and Soil Strength Loss. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

Less Than Significant. A project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the State of California Seismic Hazard Zone, Venice Quadrangle Map (1999) the Site is not within an area identified as having a potential for slope instability. Additionally, according to the County of Los Angeles Seismic Safety Element (Leighton, 1990) and the City of Los Angeles Seismic Safety Element (1996),[23] the Site is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Site, nor is the Site in the path of any known or potential landslides. The Geotechnical Investigation does not consider the potential for a landslide to be a hazard to this Project.

The Project Site is flat and free from the potential of landslide. Finally, there is a general lack of elevation difference slope geometry across or adjacent to the Project Site. Therefore, no impact with respect to landslides would occur as a result of the Proposed Project.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

Geologic Materials

Based on Geocon's field investigation and published geologic maps of the area, the Site is underlain by a thin veneer of artificial fill materials which are further underlain by Holocene Age alluvial deposits consisting of varying amounts of poorly graded sand, silty sand, sandy silt and sandy clays extending

[23] *Los Angeles Safety Element, Exhibit C Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed September 28, 2012.*

approximately 50 feet below the existing ground surface. These Holocene Age sediments are underlain by marine and continental sediments of the Pleistocene Age Lakewood Formation, generally consisting of sand, silt and gravel (California Department of Water Resources, 1961).

Artificial Fill

Minor amounts of artificial fill were encountered throughout the area of proposed development. The fill was observed in the current as well as prior field explorations to a maximum depth of 4 feet below existing ground surface. The artificial fill generally consists of brown to dark brown silty sand with minor amounts of gravel and construction debris. The artificial fill is characterized as slightly moist and medium dense. The fill is likely the result of past grading and demolition activities at the Site. Deeper fill may exist between excavations and in other portions of the Site that were not explored.

Alluvium

The artificial fill materials are underlain by relatively flat-lying Holocene age alluvial flood plain deposits generally consisting of interbedded, fine-grained poorly graded sand, silty sand, sandy silt, and clay. The soils are primarily moist to saturated and medium dense to dense or soft to stiff. Within the alluvial deposits, a 3- to 20-foot thick zone of soft silt and clay was encountered in Boring 1 as well as Cone Penetrometer Tests (CPT) CPT-3 and CPT-4. The top of the soft zone varies from depths between 11 and 13 feet below ground surface and is underlain by relatively dense sand and silty sand. The alluvial deposits are derived from stream channel and flood plain deposits from the nearby Ballona Creek, Baldwin Hills, and Santa Monica Mountains.

Project Impacts

The Project Site is currently undeveloped.[24] Any loose topsoil that was previously onsite has been removed by wind and water/rain erosion, leaving artificial fill.

During construction, the grading and excavation would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion would not occur during Project construction. Furthermore, compliance with the Mitigation Measures in this section would reduce any potential impacts to a less than significant level.

Excavation would extend to a depth of 23 feet below the ground surface to include two levels of subterranean parking. All grading activities require grading permits from the City of Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential

[24] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

impacts to acceptable levels. In addition, all on-site grading and Site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills.

The area surrounding the Project Site is completely paved and developed (to the north, south, and west), and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. To the east across Vista Del Mar is a bluff topped by residential single-family homes.

During construction, the Project would be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the incorporation of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which would be in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations and would be approved by the City Engineer. With implementation of the required construction BMPs (as described in Mitigation Measure 6-3**),** the impacts of soil erosion during construction would be less than significant.

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

Overall, Project impacts of soil erosion would be less than significant. The recommendations from the Geotechnical Investigation (see pages 11 to 32 of the Geotechnical Investigation, included as Appendix D to this IS/MND, for the full list of recommendations) are intended to further reduce the potential for soil erosion, among others. The Mitigation Measures of this section are intended to further reduce the potential impact of soil erosion.

Mitigation Measure

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

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
    - Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
    - Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Further, the Project would provide mitigation for its potential for liquefaction and is subject to the Mitigation Measures below. Therefore, the Project would result in a less than significant impact related to an unstable geologic unit or unstable soil.

Mitigation Measure

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

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
    - Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
    - Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

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

No Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area.

The soils encountered at the lowest subterranean levels are primarily granular in nature and are considered to be "non-expansive." The recommendations presented in the Geotechnical Report assume that

foundations and slabs will derive support in these materials. As such, the Project would result in no impacts related to expansive soils.

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

No Impact. This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems would occur.

7. GREENHOUSE GAS EMISSIONS

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

Potentially Significant Unless Mitigation Incorporated. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature.

What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect greenhouses have in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2E). Large emission sources are reported in million metric tons of CO_2E ($MMTCO_2E$).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows:

- By 2010, reduce greenhouse gas emissions to 2000 levels;
- By 2020, reduce greenhouse gas emissions to 1990 levels; and
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other feasible and cost-effective statewide measures, such that greenhouse gas emissions are reduced as follows:

- 2000 GHG emission levels by 2010 (which represents an approximately 11 percent reduction from "business-as-usual" [BAU] conditions); and
- 1990 levels by 2020 (approximately 30 percent below BAU conditions).

As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. This Scoping Plan was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health.

An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The proposed Scoping Plan was approved by the ARB on December 11, 2008.

There are currently no applicable adopted thresholds or guidance adopted by the SCAQMD or City of Los Angeles to assess the significance of potential impacts associated with greenhouse gases. In the absence of established GHG thresholds, however, the Governor's Office of Planning and Research (OPR) nonetheless recommends, in its 2008 technical advisory, that lead agencies should make a good-faith effort to calculate, model, or estimate the amount of CO_2 and other GHG emissions from a project. In the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a "significant impact," the OPR recommends that individual lead agencies may undertake a project-by-project analysis that is consistent with available guidance and current CEQA practice.

The construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels from a variety of area, mobile, and energy sources and processes, including the operation of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the duration of construction activities.

Table IV-9
Estimated Daily Construction Emissions – Mitigated

Construction Phase	Non-Bio CO_2 (Pounds per Day)	CH_4 (Pounds per Day)	CO_2e (Pounds per Day)
Demolition			
On-Site Emissions	1,275	<1	1,283
Off-Site Emissions	258	<1	258
Total Emissions	1,533	<1	1,541
Site Preparation			
On-Site Emissions	2,948	1	2,966
Off-Site Emissions	66	<1	66
Total Emissions	3,014	1	3,032
Grading			
On-Site Emissions	2,971	1	2,989
Off-Site Emissions	105	<1	105
Total Emissions	3,076	1	3,094
Building Construction			
On-Site Emissions	2,960	1	2,976
Off-Site Emissions	972	<1	973
Total Emissions	3,932	1	3,949
Paving			
On-Site Emissions	1,706	1	1,717
Off-Site Emissions	127	<1	127
Total Emissions	1,833	1	1,844
Architectural Coating			
On-Site Emissions	281	<1	282
Off-Site Emissions	140	<1	140
Total Emissions	421	1	422
Maximum Daily Emissions (Grading)			3,949

Source: DKA Planning, 2013, based on CalEEMod 2013.2.2 model analysis. Calculation sheets are provided in Appendix A to this IS/MND.

As illustrated in Table IV-9, construction emissions of CO_2e following implementation of Mitigation Measures in Section III (Air Quality) would peak during the building phase, where 3,949 lb/day of CO_2e emissions are projected. There are no quantified thresholds of significance for short-term construction that are recommended by ARB, SCAQMD, or the City of Los Angeles. Moreover, this level of GHG emissions is negligible when compared to the 542 million metric tons of CO_2e annually that was estimated in California alone in 2010. As a result, the construction-related GHG emissions are not expected to have significant impacts on the environment.

As for the long-term operations, greenhouse gas emissions were calculated for area source, energy, waste, water, and mobile vehicle operations. As shown in Table IV-10, the Proposed Project would result in 1,845 metric tons of CO_2e per year. This magnitude of emissions is not considered to have significant direct or indirect impacts on climate change in light of the policy plans that have been developed by the State of California to address cumulative emissions of GHG that could impact global climate change (see Section 7.b for an evaluation of the Project's consistency with these policy plans).

In addition to the GHG emission reductions described above, it is important to note that the CO_2e estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. Such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that merely shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

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

It is impossible to know at this time whether residents, employees, and customers of the Proposed Project would have longer or shorter trips; whether they would walk, bike, and use public transportation more or less than under existing circumstances; and whether their overall driving habits would result in higher or lower VMT. Much of the vehicle-generated CO_2 emissions attributed to the Project could simply be from vehicles at an existing location moving to the Project Site, and not from new vehicle emissions sources relative to global climate change. Therefore, the net contribution would likely be much less than the estimated emissions.

The Proposed Project would also incorporate several design elements and programs that can further reduce the carbon footprint of the development, including:

- Located near residential neighborhoods;
- Access to several public transportation bus lines; and
- Inclusion of solar panels which would supplement the electrical power to the common areas.

Table IV-10
Annual Greenhouse Gas Emissions - Operations

Scenario and Source	CO_2e (Metric Tons per Year)
Area Source	19
Energy	336
Mobile Source	1,362
Waste	29
Water	74
Total Emissions	25**
Construction	1,845
Total Emissions	19

Source: DKA Planning, 2013, based on CalEEMod 2013.2.2 model analysis, included as Appendix A to this IS/MND.
***Pursuant to guidance from the AB32 Scoping Plan and SCAQMD, construction phase emissions were amortized over the lifetime of the project, defined as 30 years, to normalize emissions for comparison with long-term operational emissions.*

Mitigation Measure:

VII-10. Green House Gas Emissions

- Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the project.

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

Less Than Significant Impact. The Project would contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. However, the California Air Resources Board's (CARB) AB 32 Scoping Plan provides the basis for policies that would reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Proposed Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. As shown in Table IV-11, the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the Project's cumulative impact on climate change is considered less than significant.

Table IV-11
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
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 Title 24 standards and calls for several measures designed to reduce energy consumption. It would also use energy form the Los Angeles Department of Water and Power, which has goals to diversity its portfolio of renewable energy sources.
Diesel Anti-Idling. CARB limits diesel-fueled commercial motor vehicle idling, including construction vehicles.	Consistent. Construction vehicles and those making deliveries to the Site will be limited to idling no more than five minutes.
Heavy-Duty Vehicle Emission Reduction Measures. Increased efficiency in the design of heavy-duty vehicles and an education program for the heavy-duty vehicle sector.	Consistent. Construction vehicles would be required to meet increasingly stringent Tier 3 and Tier 4 standards for engine efficiency.
Urban Forestry. A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through expansion of local urban forestry programs.	Consistent. Landscaping for the Project would result in a net increase in planted trees throughout the Project Site and include drought tolerant plant species.
Smart Land Use and Intelligent Transportation Systems. Encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential and commercial development along transit corridors.	Consistent. The mixed-use Project would locate substantial residential and commercial uses near Metro Line 115 that provides connections to the Metro Green line light rail line and other municipal bus lines. It would also improve the jobs/housing balance of this predominantly residential neighborhood and provide more local-serving commercial uses that reduce vehicle travel outside of the Playa del Rey community.
Transportation Emissions Reduction. Provide shuttle service to public transportation.	Consistent. Metro Line 115 serves the Project directly and provides direct connections to other Metro bus lines, municipal bus lines, and Metro Green Line light rail service.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. The Project would 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.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. Reduce energy use in public and private buildings by 20% by 2015 as compared to 2003 levels.	Consistent. The Project calls for several measures designed to reduce energy consumption.
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 Proposed Project would participate in the City's waste diversion programs as mandated by AB 939 to divert 50% of waste to landfills.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.

Source: DKA Planning, 2013.

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following reports and are included as Appendix E to this IS/MND:

E.1 Phase I Environmental Site Assessment, prepared by Environmental Engineering & Contracting, Inc., dated November 16, 2009.

E.2 Soil Vapor Survey Report, prepared by Environmental Engineering & Contracting, Inc., dated November 11, 2011.

E.3 Survey of Suspect Asbestos-Containing Materials, prepared by BA Environmental, dated February 2010.

E.4 Certificate of Completion and Non-Hazardous Waste Manifest, Asbestos Abatement, prepared by P.W. Stephens Environmental, Inc., dated September 15, 2011.

E.5 Suspect Lead-Based Paint Investigation Report, prepared by BA Environmental, dated February 19, 2010.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project involves the construction of approximately 72 residential units and 14,500 square feet of commercial space including 13,000 square feet of retail and 1,500 square feet of restaurant uses. Other than the typical cleaning solvents used for janitorial purposes, no hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project.

Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. There is nothing unique or specific about the Project or its location that would warrant any mitigation beyond general compliance.

Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less than significant impact would occur.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

This subsection is based on the Phase I Environmental Site Assessment, included as Appendix E.1 to this IS/MND.

Site History

From at least the late 1910s, the northern portion of Project Site was developed with a passenger rail station. The Pacific Electric passenger rail tracks were located along the eastern boundary of the Site. The central and southern portions of the Site consisted of graded and undeveloped areas.

By the early 1950s, the rail station was replaced with a restaurant and an oil tank was added to the northern portion of the Site, and an unknown structure was constructed in the southeastern corner of the Site. By the late 1950s, a liquor store/food store was constructed in the northern portion of the Site, a gasoline service station was constructed along the southern portion of the Site, and an office building replaced the structure formerly located in the southeastern corner of the Site.

Building records from 1961 indicate that the two structures formerly located along the northern portion of the Site were replaced with a gasoline service station and repair garage, including underground storage tanks (USTs) and a canopy.

Building records from 1962 indicate that a restaurant was constructed in the central portion of the Site. By the mid-1960s, a paved driveway was constructed along the central portion of the Site and the Pacific Electric passenger rail tracks were removed.

Building records from 1967 indicate that a "lubrication bay," which is likely an oil change and automotive fluids area, was added to the gasoline service station in the northern portion of the Site. Building records from 1972 indicate that an addition to the restaurant structure in the central portion of the Site was constructed. Building records from 1973 and 1975 indicate that the structure in the southeastern corner of the Site was converted from a retail structure to a restaurant and that a canopy was added to the structure.

Building records from 1982 indicate that the gasoline service station in the northern portion of the Site was demolished, the gasoline USTs were removed, and the former area of the USTs was backfilled, although the source of the fill was not identified. Building records from the 1988, 1989, 1990, and 1991 indicate that the northern portion of the Site was used as a seasonal Christmas tree sales lot, a seasonal activity that appeared to continue until the mid-2000s.

Building records from 1998 indicate that the former gasoline service station in the southern portion of the Site had changed to an office building and that this structure, as well as the restaurant structure in the central portion of the Site were demolished.

The 1998 building records also identify an 8,000 gallon gasoline UST was located in the southern portion of the Site at the time of the 1998 demolition, although according to a previous investigation, the UST was removed at the time of the demolition.

By early 2000s, the Site appeared mostly vacant and undeveloped, with the exception of the unoccupied structure in the southeastern corner of the Site and the temporary use of the northern portion of the Site for recreational boat storage.

In 2005, Vista Del Mar was widened and the project resulted in the acquisition of a southeastern portion of the Site by the City of Los Angeles.

Previous Environmental Reports

Phase I and Phase II Environmental Site Assessments, as well as a Supplemental Phase II Environmental Site Assessment, were prepared by LeRoy Crandall and Associates (LCA) in April 1990, November 1990, and March 1991, respectively. (These reports are included in Appendix F to the current Phase I ESA, which is included as Appendix E.1 to this IS/MND.) The purpose of the LCA Supplemental Phase II ESA was to determine the presence of possible subsurface contamination in areas of suspected contamination from former gasoline service stations, which were identified in the LCA Phase I and LCA Phase II, and located at the northern and southern portions of the Project Site. The LCA Phase II involved the drilling of four borings and converting three into groundwater monitoring wells along the southern portion of the Site. Laboratory analyses performed on collected soil and groundwater samples from the LCA Phase II did not indicate fuel hydrocarbons in the investigated areas. As part of the LCA Supplemental Phase II ESA, seven borings were drilled into the northern portion of the Project Site to a maximum depth of 20 feet and two of the borings were converted to monitoring wells, which were placed in the former UST excavation areas. Selected soil samples from the borings were analyzed for petroleum hydrocarbons, total fuel hydrocarbons, and volatile aromatic hydrocarbons. Laboratory results indicated that concentrations of fuel or volatile aromatic hydrocarbons were not detected. However, trace amounts of petroleum hydrocarbons were detected in the 5-foot samples of the monitoring well in the vicinity of the former waste oil UST. The 10-foot sample of the same monitoring well contained no detectable levels of petroleum hydrocarbons, and as such, LCA attributed the trace amounts to either the former waste oil UST or decomposing organic matter. LCA concluded that the levels of hydrocarbons present in the underlying soil did not pose a significant environmental impact to the Project Site.

Recognized Environmental Conditions

The term "Recognized Environmental Conditions" (RECs) is defined by ASTM as the "presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property."

One REC was determined to be associated with the Site:

Del Rey Cleaners: A groundwater investigation of Del Rey Cleaners, a dry cleaning facility located approximately 540 feet northeast of the Site, detected tetrachloroethylene (PCE) at concentrations as high as 43,500 micrograms per liter (ug/l) in groundwater. According to correspondence with the Regional Water Quality Control Board, Los Angeles Region (RWQCB), no additional environmental investigations have been conducted since 2002. Since no effort has been made to remediate the groundwater impacts from this presumably up gradient dry cleaning facility, Del Rey Cleaners represents a REC for the Site and the Phase I recommends a Phase II Groundwater Investigation be prepared to determine if groundwater impacts exist at the Site.

As discussed under Volatile Organic Compounds, below, in December 2009, Environmental Engineering & Contracting (EEC) conducted a Phase II groundwater investigation at the Site.

Due to the shallow groundwater depth in the area, it is likely that construction dewatering would be required for the proposed subterranean parking. Pumping activities could increase the groundwater gradient toward the Site, which could pull the documented groundwater impacts at Del Rey Cleaners towards the Site.

Dewatering recommendation are found on pages 11 to 32 of the Geotechnical Investigation, included as Appendix D to this IS/MND. As described under Soil Vapor Survey, below, analytical results for soil vapor samples collected from the soil gas probes indicate that VOCs are not present at levels in soil vapor that are above laboratory detection limits.

Historic Recognized Environmental Condition

The term "historic recognized environmental condition" (HREC) is defined in ASTM Practice E 1527-05 as "conditions which in the past would have been considered a REC, but which may or may not be considered a REC currently." No HRECs were determined to be associated with the Site.

Former Underground Storage Tanks (USTs)

According to the historical resources reviewed, two gasoline service stations and associated USTs were formerly located at the Site and the potential exists for the former USTs to have impacted the Site. However, according to the analytical results obtained from the previous investigations performed at the Site, it does not appear that former USTs have resulted in significant impacts to the subsurface.

Imported Fill Material

Imported fill used to backfill the UST excavations in the northern portion of the Site may have also impacted the Site. However, according to the analytical results obtained from the previous investigations performed at the Site, it does not appear that the use of imported fill at the Site has resulted in significant impacts to the subsurface.

Radon

The EPA has designated three zones of classification indicating the predicted average indoor screening level of radon per county. Los Angeles County, California is classified in Zone 2. Zone 2 is designated as having an indoor average level between 2 and 4 picocuries per liter (pCi/L). The EPA has a set standard of 4.0 pCi/L as the concentration of radon at which corrective action is recommended. Based on the potential use of the Site (residential), elevated levels of radon may be of concern. However, testing is required to determine site-specific radon levels.

Because the Project would include residential uses or other purposes involving sensitive receptors, radon testing shall be conducted, consistent with standard requirements, to ensure that elevated radon levels are not present at the Site (Mitigation Measures, below).

Volatile Organic Compounds (VOC)

This subsection is based on the Soil Vapor Survey Report, included as Appendix E.2 to this IS/MND.

The 2009 Phase 1 ESA identified the PCE contaminated groundwater released from Del Rey Cleaners, located approximately 540 feet northeast of the Site, as a "Recognized Environmental Condition" (REC). As a result, it was recommended that a Phase II groundwater investigation be prepared to determine if impacted groundwater from the Del Rey Cleaners plume had impacted the Project Site.

In December 2009, EEC conducted a Phase II groundwater investigation at the Site. A total of six (6) soil borings were advanced: four (4) soil borings on the Site and two (2) soil borings at 200 Culver Boulevard, between the Site and the Del Rey Cleaners. Groundwater samples were collected at approximately 10 feet below ground surface at each boring.

Laboratory data from this investigation indicated that volatile organic compounds (VOCs) were not present in levels above laboratory detection limits.

Because EEC determined the limits of the plume associated with Del Rey Cleaners (non-detect 100 feet down gradient of the cleaners property), soil vapor sampling was determined not to be necessary at the Site based on "Plume Test and Critical Distance Determination" presented on page 12 of ASTM E2600 (Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions). According to the standard:

> "9.2 Plume Text and Critical Distance Determination – If information related to the boundaries of the contaminate plume from known contaminated *properties* is available , the *critical distance* test can be conducted. The *critical distance* is the lineal distance in any direction between the nearest edge of the *contaminated plume* and the nearest edge of the *contaminated plume* and the nearest *TP* boundary, and is equal to 100 ft. (30.5 m) for *COC* or 30 ft. (9m) for dissolved petroleum hydrocarbon *COC*. The *critical distance* for petroleum hydrocarbon *COC* as LNAPL is the same as for nonpetroleum hydrocarbon *COC* (that is, 100 ft. (30.5 m))."

Based on the critical distances set forth by the standard and the definition of the Del Ray Cleaners plume, EEC concluded that soil vapor sampling was not necessary. In October 2011, Partner Engineering and Science, Inc. (Partner) conducted a Phase I ESA at the Site on behalf of US Bank. In this assessment, Partner identified the documented impacts at Del Rey Cleaners as a REC based on the amount of time that had elapsed since EEC's Phase II groundwater investigation. As a result, Partner recommended addressing potential vapor intrusion concerns prior to any construction at the Site.

Soil Vapor Survey

The soil vapor survey included the advancement six (6) direct push soil borings at the Site using a truck-mounted direct-push rig. The total depth of each borings extended to a maximum depth of 5 feet below ground surface (fbgs), the maximum extent feasible due to the shallow groundwater conditions. Soil boring locations are presented in Appendix E, Soil-Vapor Boring Location Map.

Following the completion of field activities and laboratory sample analyses, the data was reviewed to complete the evaluation. Concentrations of all volatile organic compounds (VOCs), including tetrachloroethylene (PCE), were not detected above laboratory detection limits. Soil vapor VOC data is illustrated in Appendix E.

The lithology of soil borings SG-2, SG-3, SG-5, and SG-6 was described by Environmental Engineering & Contracting's field geologist as consisting of primarily brown, medium dense, fine grained sand with no hydrocarbon staining or odor. Soil in SG-1 and SG-4 was described as grayish-brown, medium dense, fine grained sand with a gray sandy clay layer from approximately 4 to 4.5 fbgs.

Photo ionization detector (PID) readings were taken of soil collected at 2 fbgs and 5 fbgs in each soil boring. All soil analyzed returned PID readings of 0.0 parts per million by volume (ppmv).

Following soil vapor sampling, the six soil gas probes were destroyed by removing the full length of the ⅛-inch nylaflow tubing and small airstone filter from each borehole and backfilling the boreholes with bentonite. The boreholes were then completed to match surrounding conditions.

Analytical results for soil vapor samples collected from the soil gas probes indicate that VOCs are not present at levels in soil vapor that are above laboratory detection limits. Therefore, impacts related to VOCs would be less than significant.

Asbestos-Containing Material (ACM)

The Project Site is currently undeveloped. One vacant commercial building located near the southern tip of the Project Site was previously demolished. That demolition is accounted for in the following discussion. A visual screening for suspect asbestos-containing materials in the now-demolished building was conducted at the time of the site reconnaissance during the Phase I ESA. Although the majority of the interior of the structure was inaccessible, suspect materials that could be observed at the on-site structure included, but are not limited to ceiling tiles, wallboard/joint compound, carpet mastic, roofing materials, and baseboard

mastic. During the site reconnaissance, these materials appeared to be in fair to poor condition. This inspection did not include observations for hidden materials such as materials under existing floors or behind walls. Given the 1950s construction date of the Site structure, there was the potential that asbestos was present in these materials.

This following is based on the Survey of Suspect Asbestos-Containing Materials and the Certificate of Completion and Non-Hazardous Waste Manifest, Asbestos Abatement, included as Appendix E.4 to this IS/MND.

BA Environmental performed a visual survey of suspect friable and non-friable ACMs. Friable materials are materials which can be crumbled, pulverized, or reduced to powder by hand pressure when dry. Non-friable materials are materials in which the fibers have been locked in by a bonding agent, coating, or binder, and may not release fibers during normal use and handling. Improper handling, such as grinding or sanding of non-friable ACMs, will render these materials friable. Suspect ACMs observed and sampled included panel board glue (white and black) drywall and joint compound, plaster composite, button board, 2' x 4' acoustic ceiling panels, stucco, 12" x 12" self-adhesive floor tile and associated mastic, roofing composite materials and roofing mastic. Most of the suspect friable and non-friable materials appeared to be in fair to poor condition.

On February 8, 2010, BA Environmental conducted a Survey of Suspect Asbestos-Containing Materials (ACMs). A total of 39 bulk samples of suspect ACMs were collected and submitted to the laboratory for analysis. Some samples were determined by the analyst at the laboratory to include an additional layer of suspect ACMs that required analysis. This made a total of 46 samples of suspect ACMs. Additionally, due to the "Positive Stop" request issued to the laboratory, a total of 6 samples were not analyzed. This report reflects the 40 samples analyzed.

Suspect ACMs observed and sampled included panel board glue (white and black) drywall and joint compound, plaster composite, button board, 2' x 4' acoustic ceiling panels, stucco, 12" x 12" self-adhesive floor tile and associated mastic, roofing composite materials and roofing mastic. Most of the suspect friable and non-friable materials appeared to be in fair to poor condition.

Table IV-12 lists ACMs identified during the survey, including the location and estimated total quantity.

Table IV-12
Asbestos-Containing Materials

Material	Location	Friable/Non-Friable Location	Estimated Quantity
Panel Board adhesive (white)	Room 1	Non-friable	92 sf
Roofing Mastic	Roof seam between flat roof and concrete roof	Non-friable	20 linear feet
Roofing Mastic	Roof at penetration and pitch pockets	Non-friable	40 sf
Source: BA Environmental, February 2010.			

BA Environmental recommended several measures regarding ACMs identified at the Site, all of which were implemented during demolition of the abandoned structure. A Certificate of Completion and Non-Hazardous Waste Manifest was issued by P.W. Stephens Environmental, Inc. on September 15, 2011 that certifies that the asbestos abatement project has been completed for 6917 South Vista Del Mar. The scope of work included removing asbestos containing panel board adhesive from room #1 and removing mastic from roof penetration and pitch pockets and seam between flat roof. Therefore, impacts related to ACM would be less than significant.

Lead-Based Paint (LBP)

The Project Site is currently undeveloped. One vacant commercial building located near the southern tip of the Project Site was previously demolished. That demolition is accounted for in the following discussion. Lead-based paint samples were not collected for the purpose of Phase I ESA. Painted exterior surfaces appeared to be in fair condition. Given that the 1950s construction of the structure, it is possible that lead was present on painted surfaces. However, the presence of lead can only be confirmed through bulk or wipe sampling, and by laboratory analysis or X-Ray Florescence (XRF) survey.

The following is based on the Suspect Lead-Based Paint Investigation Report, included as Appendix E.5 to this IS/MND.

BA Environmental conducted a limited investigation of suspected lead-based paint (LBP) at selected areas of the now-demolished commercial property located at 6917 South Vista Del Mar in Playa del Rey, California. The scope of the assessment included a limited investigation to determine the location(s) of accessible LBP and lead-containing paint (LCP) in poor or peeling condition on interior and exterior surfaces of the Site proposed for renovations or demolition.

During the investigation, paint in poor or peeling condition was often observed. One sampling location was identified as having LBP. Two sampling locations were identified as having LCP. These sampling locations can be seen in Figure IV-5, Limited Lead-Based Survey.

The LBP and LCP at these locations warrant abatement in the event of demolition or renovation activities that will impact the LBP and LCP. The LBP and LCP sampled at the Site were observed to be in poor or peeling condition. LBP or LCP were not detected during analysis of the remaining samples.

Building material surfaces and components with LBP (lead concentrations greater than or equal to 5,000 parts per million (ppm)), LCP (lead concentrations less than 5,000 ppm and greater than or equal to 600 ppm) and "lead-safe paint" (lead concentrations less than 600 ppm) that were detected at the Site are identified in the Suspect Lead-Based Paint Investigation Report, included as Appendix E.4.

BA Environmental recommended several measures regarding the LBP and LCP identified at the Site, all of which were implemented during demolition of the abandoned structure. Because these measures were implemented during construction, and no LBP or LCP remain at the Project Site, impacts related to lead-based paint would be less than significant.

Oil Fields

The Site is nearby the Playa Del Rey Oil Field.[25] Based on a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Oil and Gas Well Location Map W1-5, the Site is not located within the boundaries of an oil field. No oil wells are located in the immediate vicinity of the Site. However, due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on the location map. Other wells could be encountered during construction. Any wells encountered will need to be properly abandoned in accordance with the current requirements of the DOGGR (see Mitigation Measures of this Section). The Project impacts related to the potential for oil wells to occur onsite would be reduced to less than significant with mitigation.

Methane

The Site is located within the boundaries of a methane zone and a methane buffer zone, as defined by the City of Los Angeles (2004). A permanent methane gas mitigation system may be necessary beneath the proposed building at the Site. It is recommended that a methane gas consultant be retained for the evaluation and design of such a system if required (see Mitigation Measures of this Section).

The City's Methane Ordinance administrated by the Department of Building and Safety (LADBS) regulates all projects within Methane Zones and Methane Buffer Zones (LAMC Section 91.7011 *et seq.*) The Project would follow all applicable LADBS requirements during construction and operation. The Project impacts related to its location in a methane zone would be reduced to less than significant with mitigation.

Hazardous Substances

No hazardous substances that constitute evidence of a recognized environmental condition were observed at the Site at the time of the site reconnaissance.

Unidentified Containers

No unidentified containers that constitute evidence of a recognized environmental condition were observed at the Site at the time of the site reconnaissance.

Staining

No unidentified staining that constitutes evidence of a recognized environmental condition was observed at the Site at the time of the site reconnaissance.

Stressed Vegetation

---

[25] *Los Angeles Safety Element, Exhibit E, Oil Field and Oil Drilling Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed October 1, 2012*

No unidentified stressed vegetation that constitutes evidence of a recognized environmental condition was observed at the Site at the time of the site reconnaissance.

Aboveground Storage Tanks (ASTs)

No aboveground storage tanks were observed on the Site at the time of the site reconnaissance.

Underground Storage Tanks (USTs)

Regulatory records review did not indicate the current registration of USTs at the Site, and no evidence of vent pipes, fill pipes, or access ways indicating USTs was discovered at the time of the site reconnaissance. However, as previously mentioned, historical presence of several USTs was uncovered during a review of building records for the Site.

According to the historical resources reviewed, two gasoline service stations and associated USTs were formerly located at the Site and the potential exists for the former USTs to have impacted the Site. In addition, imported fill used to backfill the UST excavations in the northern portion of the Site may have also impacted the Site. However, according to the analytical results obtained from the previous investigations performed at the Site, it does not appear that former USTs or imported fill have resulted in significant impacts to the subsurface.

Pits, Ponds, And Lagoons

No ponds or lagoons were observed at the Site at the time of the site reconnaissance.

PCB-Containing Equipment

Pole-mounted transformers were observed along the southern portion of the Site and appeared to be in good condition. It appears that the transformers are owned and operated by the Los Angeles Department of Water and Power (LADWP), which would responsible for cleanup in the event of a spill or leak. As such, the presence of pole-mounted transformers do not represent an environmental concern to the Site.

Solid Waste Disposal

No indications of improper disposal of solid waste or burial activities were noted in the Phase I ESA.

Septic System with On-Site Drainfield

The Site currently maintains capped connections to the municipal sewer system. No records indicating the presence of historical septic systems were found during a review of City building permits.

Oil/Water Separator

There were no oil/water separators identified at the Site.

Dry Wells or Injection Wells

No wells were observed on the Site or during regulatory file reviews conducted for the Site.

Contamination of Soil

No evidence of contaminated soil was observed during site reconnaissance or during regulatory file reviews conducted for the Site.

Contamination of Groundwater

There is a potential for groundwater impacts from Del Rey Cleaners, a dry cleaning facility located approximately 540 feet northeast of the Site. This is discussed in more detail under Volatile Organic Compounds.

Vapor Intrusion

No evidence of vapor intrusion was identified during site assessment activities.

Use of Pesticides on Site

No pesticides are reportedly used at the Site. It does not appear that historical use of the Site involved the use of pesticides.

Mitigation Measures:

VIII-20. Explosion/Release (Methane Gas)

- All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.
- All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.
- All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.

- Since the Project would include residential uses or other purposes involving sensitive receptors, radon testing shall be conducted to ensure that elevated radon levels are not present at the Site.
- Any oil wells encountered shall to be properly abandoned in accordance with the current requirements of the California Division of Oil, Gas and Geothermal Resources.

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

No Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. There are no schools within 0.25 miles (1,320 feet). The nearest school is Paseo Del Rey Natural Science Academy (LAUSD elementary school grades 1-5), approximately 4,100 feet from the Project Site. In addition, as discussed above, the Project would not be expected to emit any hazardous substances during construction or operation as a residential and commercial land use. Therefore, the Project would result in no impacts with respect to hazardous materials within one-quarter mile of a school.

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

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referred to lists and therefore would pose an environmental hazard to surrounding sensitive uses.

In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency.

The Project Site is not listed in either the EnviroStor[26] or GeoTracker[27] database as being listed on any cleanup site, LUST site (Leaking Underground Storage Tank), or SLIC site (Spills, Leaks, Investigation, and Cleanup).

Regulatory Review

The following is from the Phase I ESA (which is included as Appendix E.1 to this IS/MND):

---

[26] *EnviroStor, Department of Toxic Substances Control: http://www.envirostor.dtsc.ca.gov, October 2, 2012.*
[27] *Geotracker, State Water Resources Control Board: http://geotracker.waterboards.ca.gov/, October 2, 2012.*

United States Environmental Protection Agency (EPA)

A file review for the Site was requested from the EPA. No EPA records were found for the Site.

California Department of Toxic Substances Control (DTSC)

A file review for the Site was requested from DTSC - Cypress and Chatsworth offices. No DTSC records were found for the Site.

California Integrated Waste Management Board (CIWMB)

A file review for the Site was requested from CIWMB. No CIWMB records were found for the Site.

Office of Environmental Health Hazard Assessment (OEHHA)

A file review for the Site was requested from OEHHA. No OEHHA records were found for the Site.

California Regional Water Quality Control Board (RWQCB)

A file review for the Site was requested from the RWQCB – Los Angeles and Santa Ana Regions. No RWQCB records were found for the Site. However, records for Del Rey Cleaners, a former dry cleaning facility located approximately 930 feet northeast of the Site were reviewed:

- *Phase I Environmental Site Assessment, Dry Cleaners, 310 Culver Avenue, Playa del Rey, CA, prepared by DCI Services (DCI) for Bank of Yorba Linda, dated May 3, 2000 (the DCI Phase I)*

- *Limited Phase II Environmental Site Assessment, Dry Cleaners, 310 Culver Avenue, Playa del Rey, CA, prepared by DCI for Bank of Yorba Linda, dated May 9, 2000 (the DCI Phase II)*

At the time of the DCI Phase I and Phase II, Del Rey Cleaners was no longer in operation and the facility consisted of a vacant commercial property. According to the DCI Phase I, dry cleaning operations had been conducted at this facility for nearly 40 years and DCI concluded that additional investigation of the facility was warranted to determine if soil was impacted by potential spills associated with the former dry cleaning operations. DCI subsequently conducted a Phase II investigation to assess the possibility of subsurface contamination from former dry cleaning machine and the storage of tetrachloroethylene (PCE) and PCE-tainted filters.

Five soil borings were advanced using direct push technology in April 2000 to a depth of 5 feet bgs. Soil samples were collected at depths of 2 feet and 5 feet and analyzed for VOCs by EPA Method 8260. No groundwater samples were collected by DCI. Nine of the ten samples contained detectable levels of PCE, ranging from 52 to 2,300 micrograms per kilogram (ug/kg). DCI concluded that the concentrations were

moderate and consistent with "minor, incidental spills" and that "concentrations would be orders of magnitude higher if free product were involved." DCI requested agency closure for this facility.

- *Groundwater Investigation and Quarterly Monitoring Report, Del Rey Cleaners, 310 Culver Boulevard, Playa del Rey, California, prepared by Targhee, Inc. (Targhee) for the RWQCB, dated February 20, 2002*

RWQCB requested a groundwater investigation be conducted at the Del Rey Cleaners facility to define the extent of groundwater contamination.

In January 2002, soil sampling was conducted in three borings, which were subsequently converted to groundwater monitoring wells. The drilling was completed using a hollow-stem auger drill rig. Soil samples were collected beginning at a depth of 5 feet bgs and continuing to the complete depth of the boring at approximately 4 to 6 foot intervals. The soil samples were analyzed for VOCs using EPA Method 8260B. PCE was detected in two of the six soil samples at 3,110 ug/kg and 3,590 ug/kg. Minor concentrations of aromatic petroleum hydrocarbons were also identified in two of the six soil samples.

Following soil sampling, each boring was converted to a groundwater monitoring well and samples were taken from each well. Each groundwater sample was analyzed for VOCs using EPA Method 8260B. PCE was detected in all three wells, ranging from 160 to 43,500 micrograms per liter (ug/L). Groundwater was determined to flow to the southeast.

Targhee concluded that the presence of aromatic petroleum hydrocarbons indicated historic uses of the facility that were not clearly defined. Targhee also concluded that the concentrations of PCE in groundwater represented a significant impact to groundwater and that the source areas of the PCE at this facility could not be determined. According to information from the SWRCB Geotracker database and a conversation with the Mr. Henry Jones, Engineering Geologist with the RWQCB - Los Angeles Region, this facility remained an open case for tetrachloroethylene (PCE) impacts to soil and groundwater and that no work has been conducted since 2002 due to the death of the owner of this facility.

Since no known remediation to contain groundwater impact has been conducted for this facility and based on potential variations in groundwater flow direction, potential impacts to groundwater exist and represents a REC for the Site. It was recommended that an additional investigation be prepared to determine if VOCs from this dry cleaning facility have impacted groundwater at the Site.

In December 2009, Environmental Engineering & Contracting conducted a Phase II groundwater investigation at the Site. Laboratory data from this investigation indicated that volatile organic compounds (VOCs) were not present in levels above laboratory detection limits.

California State Fire Marshall (CSFM)

A request for pipeline locations for the Site was submitted to the State of California Fire Marshall (CSFM). No CSFM records were found for the Site.

South Coast Air Quality Management District (SCAQMD)

A file review for the Site was requested from SCAQMD. No SCAQMD records were found for the Site.

Los Angeles County Fire Department (LACFD)

A file review for the Site was requested from the LACFD. A response has not yet been received..

Los Angeles County Public Health Investigation (PHI)

A file review for the Site was requested from the PHI. No PHI records were found for the Site.

City of Los Angeles Fire Department (LAFD)

A file review for the Site was requested from the LAFD. No LAFD records were found for the Site.

Database Search

The Site is not on any Federal NPL Sites, CERCLIS Sites, Federal CERCLIS NFRAP Sites, Federal Engineering/Institutional Controls, Federal RCRA CORRACTS Sites, Federal RCRA TSD Facilities, Federal RCRA SQG, Federal RCRA LQG, Federal ERNS Sites, State NPL-equivalent Sites, State CERCLIS Sites, State Landfill/SW Disposal Sites, State LUST Sites, State UST/AST Sites.

The Phase I ESA concluded that the nearby Del Rey Cleaners represented a REC and may have contaminated groundwater that flows to the Site. The Soil Vapor Survey Report concluded that soil vapor samples collected from the soil gas probes indicate that VOCs are not present at levels in soil vapor that are above laboratory detection limits.

Therefore, as the Project Site is not located on a list of hazardous material sites, and would not result in a significant hazard to the public or environment, no impact would occur.

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

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard. The nearest airport to the Project Site is Los Angeles International Airport (LAX), approximately 0.9 miles to the south.[28] However, the Project is not within the boundaries of the governing airport land use plan (LAX Specific Plan).[29] In addition, the Project would include residential and commercial spaces, which are land uses that

[28] *As the crow flies distance, measured from the Project's southern corner to the nearest runway facility at LAX.*

[29] *LAX Specific Plan, September 29, 2004:* http://ourlax.org/docs/lax_SpecificPlan/FinalLAXSpecificPlan_092904.pdf

already exist in the area. The Project would not create a unique safety hazard for people residing or working in the area. Therefore, no impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no private airstrips in the vicinity of the Project Site, and as such, no impacts would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project would not substantially impede public access or travel on public rights-of-way and would not interfere with any adopted emergency response plan or emergency evacuation plan. As discussed below under Transportation/Traffic, the Project would not result in significant impacts at any of the six study intersections during the morning and afternoon peak hours.

The nearest Disaster Route is along Manchester Boulevard.[30] Therefore, the Project's impacts to area traffic would have no significant impacts on nearby roadways or intersections, and would not interfere with an emergency response or evacuation plan. As such, a less than significant impact would occur.

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

No Impact. A significant impact may occur if a project is located in proximity to wildlands areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in an area of selected wildland fire hazards, nor Mountain Fire District or Fire Buffer Zone.[31] Further, the Project Site is not located in a Very High Fire Hazard Severity Zone.[32] Therefore, no impacts would occur.

---

[30] *Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed October 2, 2012.*

[31] *Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed October 2, 2012.*

[32] *Los Angeles Fire Department, Very High Fire Hazard Severity Zone map: http://lafd.org/brush/lafd_bcz8x11.pdf, accessed October 2, 2012.*

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality.

The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements. Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC Section 64.70 (the City's stormwater ordinance) and expanding on the City's existing SUSMP requirements. LID is different from the previous SUSMP, requiring a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures.

All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. Projects must comply with the LID Best Management Practices (determined on a case-by-case basis by Public Works), and if not feasible, only then do SUSMP BMPs apply.

The Project would be required to obtain an NPDES water quality permit from the LARWQCB. Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Further, as construction of the Project would disturb more than one acre of land (the total site area is approximately1.12 acres), the Project Applicant would be required to obtain coverage under

the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[33]

In addition, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project would comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Therefore, the Project would result in a less than significant impact related to water quality.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

Based on a review of the Seismic Hazard Zone Report for the Venice 7.5 Minute Quadrangle, Los Angeles County, California (California Division of Mines and Geology, 1998), the historically highest groundwater level in the area is approximately 5 feet beneath the ground surface. Groundwater information presented in the referenced document is generated from data collected in the early 1900s to present. The California Division of Mines and Geology changed its official name to the California Geological Survey and the above referenced report was prepared prior to the name change.

The Los Angeles County Department of Public Works maintains various wells in the vicinity of the subject site. The closest active well is Well No. 1243B located approximately 0.43 miles north-northwest of the site. Review of the groundwater level measurements between 1963 and 2008 for Well No. 1243B indicates that the groundwater level has fluctuated between 1.6 and 15.1 feet below the existing ground surface (LADPW, 2008). The most recent groundwater level measurement for Well No. 1243B was measured in April 2008 at a depth of 11.1 feet below the existing ground surface (LADPW, 2008).

Groundwater was encountered in Geocon's borings as well as the prior site explorations by others at depths ranging from 7 to 8 feet (elevations 3 to 4 feet MSL) beneath the ground surface. It is not uncommon for groundwater levels to vary seasonally or for groundwater conditions to develop where none previously

---

[33] *California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, October 4, 2012.*

existed, especially along impermeable fine-grained silts or clays, areas which are heavily irrigated or after seasonal rainfall. Proper surface drainage of irrigation and precipitation would be critical to future performance of the project.[34] Compliance with the Mitigation Measures in this Section would reduce any potential impacts to a less than significant level.

Environmental impacts to groundwater quantity may result from implementation of the Proposed Project through direct additions or withdrawals, or through substantial loss of groundwater recharge capacity. The Department of Building and Safety requires, when feasible, that applicants modify the structural design of a building so as not to need a permanent dewatering system. These measures, with which the Project would comply, include use of extracted groundwater for purposes such as landscape irrigation, decorative fountains (if included in the Project), and toilet flushing. Overall, the Project would result in a less than significant impact with respect to groundwater.

Mitigation Measures:

IX-10. Groundwater Quantity (Dewatering System) Environmental impacts to groundwater quantity may result from implementation of the proposed project through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capacity. The Department of Building and Safety requires, when feasible, that applicants modify the structural design of a building so as not to need a permanent dewatering system. When a permanent dewatering system is necessary, the Department of Building and Safety require the following measures to mitigate the impacts to a less than significant level:

- Prior to the issuance of any permit for excavation, the applicant shall, in consultation with the Department of Building and Safety, submit a Dewatering Plan to the decision-maker for review and approval. Such plan shall indicate estimates for how much water is anticipated to be pumped and how the extracted water will be utilized and/or disposed of.
- Extracted groundwater shall be pumped to a beneficial on-site use such as, but not limited to: 1) landscape irrigation; 2) decorative fountains or lakes; 3) toilet flushing; or 4) cooling towers.
- Return water to the groundwater basin by an injection well.

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in an urbanized area of the City of Los Angeles. No natural watercourses, including streams and rivers, exist on the Project Site. The nearest open

[34] *Geotechnical Investigation, Geocon West, December 1, 2009, page 4.*

surface water is the Del Rey Lagoon (830 feet north), Ballona Creek inlet (2,100 feet north), and Marina Del Rey inlet (4,000 feet north).

Drainage from the Project Site currently drains into the existing storm drains, via a surface flow. City of Los Angeles storm pipes in the Project vicinity are as follows:[35]

- 18-inch reinforced concrete pipe – northwest corner of Trolley Place and Culver Boulevard
- 72-inch round reinforced concrete pipe – northwest corner of Trolley Place and Culver Boulevard
- 72-inch round reinforced concrete pipe – along Culver Boulevard

Further, the Project would comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading, excavation, and fill activities, as well as the SUSMP, which addresses erosion control through peak-flow reduction and infiltration features. Thus, the Project would not substantially alter the existing drainage pattern of the area surrounding the Project Site such that it would result in substantial erosion or siltation on- or off-site. Therefore, impacts related to erosion would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The construction of new buildings would alter the existing drainage pattern of the Project Site by increasing the impervious surface area. The Project Site is currently undeveloped and covered with dirt and shrubs.[36]

As discussed in the response to Question 9(c), no natural watercourses exist on or in the vicinity of the Project Site, and runoff flows toward the existing storm drain system. No flooding is expected to occur on- or off-site due to the grades of the adjacent streets. Impacts related to runoff, including through the alternation of the course of a stream or river, would therefore be less than significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project

---

[35] *Navigate LA, City of Los Angeles, Storm Drains Layer: http://navigatela.lacity.org/index01.cfm, October 4, 2012.*

[36] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains.

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program as well as the requirements set forth in the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants, and are further described under *Construction* and *Operation*, below.

Construction

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

Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants.

Compliance with the NPDES program and LAMC requirements, as well as best management practices (BMPs) and the Mitigation Measures below, would ensure that impacts are less than significant. When properly designed and implemented, these "good-housekeeping" practices would further reduce the already less than significant short-term construction-related impacts, by controlling dust and erosion that may occur onsite and leaks from any construction equipment.

Operation

Runoff currently flows toward existing storm drain system. Development of the Project would alter the amount of runoff the Project Site by reducing the impervious surface. The Project Site is currently

undeveloped and covered with dirt and shrubs.[37]

Activities associated with operation of the 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, as the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure that operational water quality impacts would be less than significant.

Mitigation Measures:

IX-20. Stormwater Pollution (Demolition, Grading, and Construction Activities)

- Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

f) Would the project otherwise substantially degrade water quality?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, compliance with the Mitigation Measures in this Section and Federal, State, Regional, and Local regulations would reduce any potential impacts to a less than significant level.

---

[37] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

Mitigation Measures:

IX-20. Stormwater Pollution (Demolition, Grading, and Construction Activities)

- Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.
- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

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

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project would include housing, but would not be located in a 100-year flood zone. As such, the Project would have no impact with respect to placing housing within a 100-year flood zone.

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

No Impact. The Project Site is not located within a City-designated 100-year floodplain. As such, the Project would have no impact with respect to placing structures within a 100-year flood zone which would impede or redirect flood flows.

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

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The surrounding area around Marina Del Rey and the Ballona Creek have the potential to flood.

The Project Site is located within a potential inundation area.[38] Nonetheless, these areas (including all dams and levees), as with other reservoirs and dams in California, are continually monitored by various

[38] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed September 28, 2012.*

governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam and reservoir failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams and reservoirs are intended to ensure that all dams and reservoirs are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the development of the Project, and the Project would result in less than significant impacts.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

Seiches

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the project site. Flooding from a seismically-induced seiche is considered unlikely. Thus, potential impacts related to inundation by seiche would be less than significant.

Tsunamis

Tsunamis are waves generated by fault displacement or major ground movement below the ocean. Based on a review of the County of Los Angeles Seismic Safety Element (Leighton, 1990), the City of Los Angeles Seismic Safety Element (1996)[39], and Eisner et al. (2001), that the site is located in a tsunami inundation area and could be prone to hazards of a tsunami.

Flooding

The Project Site is two blocks from the start of the beach and approximately 850 feet inland from the Pacific Ocean. According to the Los Angeles County All Hazard Mitigation Plan, the Project Site is location within a designated 50-year flood plain area. Measures should be taken to minimize the effect of flooding on the proposed development.

[39] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed September 28, 2012.*

The Project Site is not located within a Hillside Area or an area identified as being susceptible to landslides.[40]

Environmental impacts may result due to the location of the Project in an area which is potentially subject to flood hazards. However, Project compliance with the requirements of the Flood Hazard Management Specific Plan (Ordinance No. 172081, effective 7/3/98) would ensure that impacts related to flood hazards remain less than significant.

Mitigation Measures:

IX-120. Flooding/Tidal Waves

- The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project is not of the scale or nature that could physically divide an established community. The Project Site is currently vacant.[41] No residential uses or communities would be divided as a result of the Project. As such, the Project would have no impact related to physical division of an established community.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The following is a list of applicable plans:

Regional Level

---

[40] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 138 Culver address, website: http://zimas.lacity.org/, accessed September.*

[41] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

- *California Coastal Commission (Coastal Zone)*
- *Southern California Association of Governments*
    - Compass Blueprint Growth Vision Report
    - Regional Comprehensive Plan (RCP)
    - 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- *South Coast Air Quality Management District's (SCAQMD)*
    - Air Quality Management Plan (AQMP)
- *Los Angeles County Metropolitan Transportation Authority (Metro)*
    - Congestion Management Plan (CMP) for Los Angeles County

City of Los Angeles

- *City of Los Angeles General Plan, including Framework Element and Land Use Element*
- *Los Angeles Municipal Code*
- *Westchester-Playa Del Rey Community Plan*
- *Del Rey Lagoon Specific Plan (Proposed)*
- *Los Angeles Coastal Transportation Corridor Specific Plan*

Consistency with Regional Plans

California Coastal Commission (Coastal Zone)

The Project Site is located within the California Coastal Zone and is therefore subject to the regulations of the California Coastal Act (Public Resources Code § 30000 et seq.). Local Coastal Programs (LCPs) are the preferred method under the Coastal Act for regulating local land uses and activities within the diverse coastal zone. The Playa Del Rey community, however, does not have a certified LCP to guide land use decisions, which are instead overseen by the Statewide decision-making body (the California Coastal Commission).

Chapter Three of the Coastal Act, Planning and Management Policies, provides guidance for development within the coastal zone. The Project would be consistent with the policies contained in the Coastal Act for a variety of reasons. First, the Project would not interfere with access to the beach or ocean. The Project would also be consistent with all land use regulations governing the Project Site (as described in detail,

below) and the Project would not impact any environmentally sensitive habitat areas. Further, the Project would develop a new mixed-use Project on a Site that is currently surrounded by both existing residential and commercial developments. Finally, the Project would be designed to be visually compatible with the surrounding community. The Proposed Project would be generally consistent in height with the surrounding buildings, and views from public vantage points would not be significantly compromised by the Project.

In addition, Sections 30604(f) and 30604(g) encourage the provision of housing opportunities for persons of low and moderate income in the coastal zone. The Project would provide eight units (12.5 percent of the units proposed) that are restricted to very-low income individuals or families. These units would increase affordable housing opportunities within the Playa Del Rey area and the broader Coastal Zone, consistent with these policies. Thus, the Project would not prejudice the ability of the City to prepare a conforming Local Coastal Program, and would further the purposes and policies of the Coastal Act.

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

Compass Blueprint Growth Vision Report

The Compass Blueprint Growth Vision, adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). The Compass Growth Vision is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035 while balancing valuable quality of life goals. The Compass Vision emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Growth Vision Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.

- *Principle 2. Foster livability in all communities*. Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.

- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize "green" development techniques.

The Compass Blueprint 2% Strategy is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in 2 percent of the land area of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass principles that would result in the greatest progress towards economic, mobility, livability, and sustainability benefits to local neighborhoods.

Regional Comprehensive Plan

SCAG has also prepared the 2008 Regional Comprehensive Plan (the 2008 RCP) in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions interrelated to housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the RCPG (Regional Comprehensive Plan and Guide) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic, and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing

local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (RTP) (discussed below) and the Compass Growth Vision Report.

2012-2035 Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the "2012-2035 RTP/SCS"). For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. While mobility is a vital component of the quality of life that the region deserves, it is by no means the only component. SCAG has placed a greater emphasis than ever before on sustainability and integrated planning in the 2012-2035 RTP/SCS, whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2012-2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards (NAAQS) as set forth by the Federal Clean Air Act. As such, the 2012-2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2023-2035 time frame and clear steps to move toward this objective. This is especially critical for our goods movement system. The development of a world-class zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2012-2035 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, greenhouse gas reduction, and economic development.

For the first time, the 2012-2035 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2012-2035 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2012-2035 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the state, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2012-2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental

and health outcomes for its 22 million residents by 2035. More importantly, the RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and an array of open spaces for future generations.

The 2012-2035 RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigations. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

The 2012-2035 RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development in proximity to transit hubs in order to reduce vehicle miles traveled and thereby reduce GHG emissions from personal vehicles.

Applicability of SCAG Plans

The goals and policies of the Compass Blueprint Growth Vision, RCP, and RTP/SCS address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to SCAG criteria, as it does not contain more than 500 dwelling units. As such, the Project would not be required to demonstrate consistency with SCAG policies contained in the Compass Blueprint, RCP, or RTP/SCS. Nevertheless, the Project would be consistent with the intent and spirit of the SCAG plans described above, as it would provide 72 residential units (including eight very-low income units) near existing commercial uses, including shops and restaurants, as well as provide additional neighborhood- and visitor-serving commercial uses that would reduce vehicle trips of residents. Also, the commercial uses developed by the Project would be located within walking distance of other residences, further reducing local vehicle trips. The Project Site is located adjacent to Metro Line 115, which has a stop along the Culver Boulevard right-of-way that borders the Project Site and which connects to other transit lines that serve the greater Project area.

South Coast Air Quality Management District (SCAQMD)

AQMP

The Project is located within the South Coast Air Basin (the "Basin") and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies. SCAQMD's AQMP was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of state and federal air quality

standards in the Basin, which is a non-attainment area. The Project's consistency with the AQMP is discussed in Section 3., Air Quality, of this IS/MND.

Los Angeles County Metropolitan Transportation Authority (Metro)

CMP

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP. The Project's consistency with the CMP is discussed in Section 16., Transportation and Traffic, of this IS/MND.

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[42] The City's General Plan is a dynamic document consisting of 11 elements, including 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a Citywide context to guide the update of the community plan and Citywide elements. The Long Range Land Use Diagram in the General Plan Framework Element identifies the Project Site as General Commercial. This designation applies to a diversity of retail sales and services, office, and auto-oriented uses comparable to this currently allowed in the "C2" zone (including residential). These uses are located outside of districts, centers, and mixed-use boulevards and occur at the intersection of major and secondary streets, or as low rise, low-density, linear "strip" development along major and secondary streets.

[42] *California Government Code Section 65300.*

Westchester-Playa Del Rey Community Plan

The Westchester-Playa Del Rey Community Plan, part of the City's General Plan Land Use Element, sets forth specific land use requirements and required entitlements for projects within the Westchester-Playa Del Rey Community Plan Area of the City, where the Project Site is located.

Land Use Designation

The Citywide General Plan Framework Element generally refers to the Community Plans for specific land use locations and entitlements. The Westchester-Playa Del Rey Community Plan designates the Project Site as General Commercial. The General Commercial land use designation is a commercial designation located mostly near major intersections. General Commercial areas are developed with uses to serve the surrounding neighborhood as well as people traveling through on the adjacent highways. Common land uses include retail, service stations, office uses, restaurants, auto repair, other services, and multiple-residential uses. The corresponding zones for the General Commercial designation are CR (Commercial-Residential), C1.5 (Commercial), C2 (Commercial), C4 (Commercial), and P (Parking).

The Project consists of the development of a new mixed-use residential and retail project containing 72 residential apartments (including eight very-low income units) above a total of approximately 14,500 square feet of ground floor commercial space including 13,000 square feet of retail and 1,500 square feet of restaurant uses.

The Project would further the principles of the Community Plan with respect to the provision of high quality residential development for all economic segments of the community, as the Project would include eight residential units for very-low income households. The Project would also serve the needs of the community by providing commercial opportunities easily accessible to the surrounding neighborhood. The type of development proposed would be consistent with the General Commercial land use designation. Therefore, impacts on the existing land use designation would be less than significant.

Westchester-Playa Del Rey Community Plan Goals

The Westchester-Playa Del Rey Community Plan contains goals, numerous objectives, and policies to guide development and uses planned within the City. Not every goal, policy, or objective in the Community Plan is applicable to the Project or the Project Site. The goals of the Westchester-Playa Del Rey Community Plan are as follows:

1. Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Westchester-Playa Del Rey Community. (Residential)

2. Encourage a strong and competitive commercial sector that promotes economic vitality and serves the needs of the Westchester-Playa Del Rey Community through safe, accessible, and well-designed commercial districts, while preserving the historic and cultural character of the community. (Commercial)

3. Provide sufficient land for limited and light industrial uses with employment opportunities that are safe for the environment and workers, and which have minimal adverse impact on adjacent uses. (Industrial)

4. Provide adequate recreation and park facilities to meet the needs of residents in the Westchester-Playa Del Rey Community Plan Area. (Public and Institutional Land Use)

5. Provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Westchester-Playa Del Rey Community, and to protect environment and aesthetic resources. (Public and Institutional Land Use)

6. Facilitate the provision of public schools and adequate school facilities to serve every neighborhood in the Westchester-Playa Del Rey Community Plan Area. (Public and Institutional Land Use)

7. Ensure that adequate library facilities are provided for the Westchester-Playa Del Rey Community. (Public and Institutional Land Use)

8. Continue to provide the Westchester-Playa Del Rey Community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidence of crime, and provide other necessary law enforcement services. (Public and Institutional Land Use)

9. Protect the residents of the Westchester-Playa Del Rey Community through a comprehensive fire and life safety program. (Public and Institutional Land Use)

10. Maintain and operate the Hyperion Treatment Plant in a manner that is safe, unobtrusive, and compatible with the surrounding community and environment. (Public and Institutional Land Use)

11. A system of highways, freeways, and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining acceptable level of service at all intersections. (Transportation)

12. Provide a well-maintained, safe, efficient freeway, highway, and street network. (Transportation)

13. Discourage nonresident traffic flow on residential local streets, and encourage community involvement in determining neighborhood traffic and parking controls. (Transportation)

14. Develop additional public transit services which improve mobility with efficient, reliable, safe, convenient alternatives to automobile travel. (Transportation)

15. Encourage alternative modes of transportation to reduce single-occupancy vehicular trips. (Transportation)

16. Encourage a system of safe, efficient, and attractive bicycle, and pedestrian routes. (Transportation)

17. Provide a sufficient supply of well-designed and convenient off-street parking lots and facilities throughout the plan area. (Transportation)

18. Protect Westchester-Playa Del Rey's unique coastal qualities by maintaining the coastal zone in an environmentally sensitive manner and preserving the scenic views of the area, while ensuring access and public use of coastal resources. (Coastal Resources)

19. Preservation and restoration of cultural resources, neighborhoods, and landmarks which have historical and/or cultural significance. (Historic and Cultural Resources)

20. Coordinate the development of LAX and its ancillary facilities and circulation system with surrounding communities to increase its safety, security, and efficient operational capabilities to serve the passenger travel and air-cargo demand throughout Los Angeles and the region, while minimizing the potential adverse environmental impacts resulting from such activities. (Relationship to LAX)

Goals 1 and 2, listed above, are applicable to the Proposed Project as a mixed-use development. The Project's consistency with the residential and commercial policies that help further the purposes of Goals 1 and 2 is examined in Table IV-13. The other goals listed above are not applicable to the Proposed Project, as the Project only proposes residential and commercial uses.

Table IV-13
Westchester-Playa Del Rey Community Plan Objectives Discussion

Objectives	Discussion
Objective 1-1. Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Westchester-Playa Del Rey Community Plan Area to the year 2025.	**Consistent.** The Project proposes 72 one- and two-bedroom residential apartment units, including 8 units for very-low income households. The housing options would meet a range of household types and income levels, particularly for residents requiring affordable units. One abandoned commercial building previously occupied a portion of the Project Site. The City declared it a nuisance requiring abatement. Consequently, it was demolished. No residents were displaced. Similarly, the Project represents an opportunity to provide housing and neighborhood- and community-serving commercial uses without demolishing any quality or occupied housing units. Therefore, the Project would conform to this objective.
Objective 1-2. Locate housing near commercial centers, public facilities, and bus routes and other transit services, to reduce vehicular trips and congestion and increase access to services and facilities.	**Consistent.** The Project would provide 72 residential units near existing commercial uses, including shops and restaurants, as well as provide additional neighborhood- and visitor-serving commercial uses that would reduce vehicle trips of residents. Also, the commercial uses developed by the Project would be located within walking distance of other residences, further reducing local vehicle trips. The Project Site is located adjacent to Metro Line 115, which has a stop along the Culver Boulevard right-of-way that borders the Project Site and which connects to other transit lines that serve the greater Project area. For

Objectives	Discussion
	all of these reasons, the Project would conform to this objective.
Objective 1-3. Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	**Consistent.** The Project would add residential units to an area currently containing both residential and commercial uses, and in doing so, add complementary uses to those uses that are already existing in the Project vicinity. The Project is not located within an established residential neighborhood, but is surrounded by City rights-of-way, which provide spatial buffers from nearby residences. Further, the Project would provide a high degree of architectural quality, with articulated facades and other design elements that would reduce the apparent massing of the structure. Therefore, the Project would conform to this objective.
Objective 1-4. Provide affordable housing and increased accessibility to more population segments, especially students, the disabled and senior citizens.	**Consistent.** The Project would provide 72 residential units of one and two bedrooms and at varying sizes from under 700 s.f. to over 1,000 s.f. Moreover, the Project would provide eight very-low-income affordable units. Consequently, the Project would provide a range of units and increased accessibility to housing for those of lower economic means and would conform to this objective.
Objective 1-5. Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.	**Consistent.** The Project is not located within an established residential neighborhood, but is surrounded by City rights-of-way, which provide spatial buffers from nearby residences. Thus, although the project provides multiple-family residential units at higher densities than nearby single-family residences, it would not insert those uses into existing residential neighborhoods. Rather, the Project is located within an area designated both by the Community Plan and the LAMC as commercial. Further, the multiple-family residential uses in the Project would occur at densities significantly below the residential densities permitted by zoning: the project would develop the Project Site with 72 units, while the LAMC permits up to 121, and the Density Bonus Ordinance permits up to 163. Also, the Project provides neighborhood-serving commercial and restaurant uses for residents of the Project, but also within short walking distance of nearby residential uses, complementing and serving those uses, and of the nearby beach. Therefore, the Project would conform to this objective.
Objective 1-6. Preserve visual resources in residential areas.	**Consistent.** The Project area consists of both residential and commercial uses. Moreover, the Project would result only in some blockage of private views from certain residences (which are not protected), and in minor losses of views from portions of Culver Boulevard, which is not designated by the State or City as a scenic highway or roadway, resulting in less-than-significant impacts to visual resources. Therefore the Project would conform to this objective.
Objective 2-1. Preserve and strengthen viable commercial development in the community, and provide additional opportunities for new commercial	**Consistent.** The Project Site is currently vacant and has been unoccupied for several years. The Project would develop the Site with a mix of residential and commercial

Objectives	Discussion
development and services within existing commercial areas.	uses, providing new opportunities for merchants, service providers, and restaurants/cafes that would serve existing and proposed residences, as well as beachgoers. Also, the Project vicinity has experienced and continues to experience a notable shortage of public parking, which negatively affects the viability of existing commercial uses. The Project would help alleviate this shortage by providing parking that substantially exceeds LAMC requirements. That is, although the Project, as an affordable housing project, is eligible for reduced parking requirements (equating to 154 parking spaces), the Project not only satisfies standard LAMC requirements (181 parking spaces), but exceeds that requirement by 20 percent and provides 218 spaces. This additional parking can serve nearby restaurants and businesses, increasing their viability by promoting visits. Therefore, the Project would conform to this objective.
Objective 2-2. Strengthen and enhance the major commercial districts of the community into distinctive, pedestrian-friendly areas providing shopping, civic, social, and recreational activities.	**Consistent.** The Project is separated from surrounding uses by roadways, but is located in an area that contains a variety of commercial and residential uses. The Project would provide additional neighborhood-serving and visitor-serving commercial uses, including retail and restaurant/café uses, which would be within walking distance of residences and the beach. The Project also would include distinctive architecture, and would provide pedestrian enhancements, outdoor seating, public art, and roadway enhancements to provide a sense of place and distinction. Therefore, the Project would conform to this objective.
Objective 2-3. Enhance the land use compatibility, visual appearance, design, and appeal of commercial development.	**Consistent.** The Project would provide a building of high architectural quality, with pedestrian-scale commercial uses and pedestrian enhancements and other public enhancements. The multi-family residential uses and commercial uses are consistent with development in the vicinity. Therefore, the Project would conform to this objective.
Objective 2-4. Further improve and enhance the Century Boulevard/98th Street Corridor as a hotel, shopping, and entertainment district serving airline travelers and visitors.	**Not Applicable.** The Project Site is not located within the Century Boulevard/98th Street Corridor.
Source: Westchester-Playa Del Rey Community Plan.	

Del Rey Lagoon Specific Plan

The pending Del Rey Lagoon Specific Plan ("Specific Plan") was adopted "in concept" by the City Council (but is not adopted) in 1982, not as a specific plan ordinance. Its regulations and policies are considered only in discretionary actions (i.e., coastal development permits, conditional use permits, variances, etc.), not in ministerial actions (i.e., building permits). The Specific Plan covers a small area within the Playa Del

Rey community. In general, the Specific Plan area is roughly bound by the Pacific Ocean to the west, Washington Street to the north, Vista Del Mar to the east, and the Manchester Avenue/Vista Del Mar intersection to the south.

The Specific Plan's main goals are to:

- Implement the goals and policies of the California Coast Act of 1976;
- Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and man-made resources;
- Assure maximum public access to the coast and public recreation area is provided; and
- Regulate all development, including use, height, density, bulk, signs, and other factors in order to be compatible with the small scale character of the existing community and provide for the consideration of aesthetics and scenic preservation and enhancement.

The Specific Plan outlines height, lot area, and parking requirements for both residential and commercial zones. The Proposed Project would follow all applicable guidelines set forth with respect to height, lot area, parking requirements for both residential and commercial uses and, furthermore, would follow the outlined permitted uses for commercial uses. As such, the Proposed Project would be in conformance with the Specific Plan.

Coastal Transportation Corridor Specific Plan

The Coastal Transportation Corridor Specific Plan Area includes all or parts of the Westchester-Playa Del Rey Community Plan Area, the Palms-Mar Vista-Del Rey Community Plan Area, the Venice Community Plan Area, and the Los Angeles International Airport Interim Plan Area, generally bounded by the City of Santa Monica on the north, Imperial Highway on the south, San Diego Freeway on the east, and the Pacific Ocean on the west.

The goals of the Coastal Transportation Corridor Specific Plan are as follows:

1. Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new commercial and industrial development within the corridor; and
2. Establish the Coastal Transportation Corridor Impact Assessment Fee process for new development in the C, M, and P Zones and for development on property owned by the Department of Airports; and
3. Regulate the phase development of land uses, insofar as the transportation infrastructure can accommodate such uses; and
4. Establish a Coastal Transportation Corridor infrastructure implementation process; and

5. Promote or increase work-related ridesharing and bicycling to reduce peak-hour trips and to keep critical intersections from sever overload; and

6. Avoid Peak Hour Level of Service (LOS) on streets and interchanges from reaching LOS F or, if presently at LOS F, preclude further deterioration in the Level of Service; and

7. Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies; and

8. Reduce commute trips by encouraging the development of affordable housing at or near job site; and

9. Ensure that the public transportation facilities that will be constructed with funds generated by the Specific Plan will significantly benefit the contributor; and

10. Encourage Caltrans to widen the San Diego freeway for high-occupancy vehicle lanes.

The Project's consistency with the Coastal Transportation Corridor Specific Plan is discussed in Section 16., Transportation and Traffic, of this IS/MND.

City of Los Angeles Planning and Zoning Code

Zoning Designation

The development of the Proposed Project is also governed by the applicable land use and zoning regulations of the Los Angeles Municipal Code (LAMC). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned [Q]C4-1VL (Commercial Zone, Height District 1VL). Pursuant to Section 12.16 of the LAMC, commercial uses such as banks, bookstores, cafes, colleges, museums, parking buildings, parking garages, retail stores, and restaurants are permitted in the "C4" zone. Residential uses are also permitted. As such, the proposed residential and commercial land uses are consistent with the C4 zoning designation on the Project Site.

Residential Density

The C4/R4 zones permit 109 dwelling units per acre (one dwelling unit per 400 s.f.). Therefore, 121 units could be constructed on the approximately 1.11-acre Project Site.[43] With the 35 percent bonus under SB 1818, 163 units could be constructed on the Project Site. Therefore, the 72 dwelling units proposed under the Project are well below the number of units permitted under the standard LAMC provisions and under the Density Bonus Ordinance.

Floor Area

[43] *48,483 s.f., divided by 400 s.f., equals 121 dwelling units permitted under the C4 zoning.*

The Project Site is located in Height District 1VL, which permits a floor-area-ratio (FAR) of 1.5:1. However, the City's Density Bonus Ordinance, consistent with SB 1818, would allow an additional FAR of 0.525, for a total FAR of 2.025:1. The maximum allowable floor area is therefore 98,133 square feet.[44] As shown in Table II-3, the Project would provide a total floor area of 87,294 square feet, which is less than the maximum floor area permitted under the Density Bonus Ordinance.

Height

Based on the Site's existing zoning and height district, the current allowable height is 45 feet and three stories. However, the height incentives provided by the City's Density Bonus Ordinance, consistent with SB 1818, permit an additional 11 feet in height and one additional story,[45] for a maximum allowable height of 56 feet and four stories. The Project would contain four levels with a building height of 52'-0" to the roof and 56'-0" to the parapet, consistent with this limitation.

Parking

Parking for the Project would be provided in a multi-level (at grade and subterranean) parking facility containing a total of approximately 218 parking spaces (37 more than required under standard LAMC provisions, and 64 more than required under the Density Bonus Ordinance). Access to the parking facility would be provided via a new driveway along the Site's Pacific Avenue frontage. The commercial parking spaces are provided at-grade, on a mezzanine level, and on a portion of the first subterranean level, while residential parking would be provided on the remainder of the first subterranean level and on the second subterranean level.

The required, provided, and green parking counts are shown in Tables IV-14, IV-15, and IV-16, respectively. Overall, the Project is required to provide 154 parking spaces under the City's density bonus provisions, and 181 parking spaces under standard LAMC rates. Although the Project qualifies for and previously requested reduced parking under the Density Bonus Ordinance, the Project does not need the reduced parking requirements and would provide 218 parking spaces, including seven required accessible spaces, which would substantially exceed the standard LAMC parking requirements for the uses proposed.

Table IV-14
Required Parking

Type	Units	Rate	Required Parking
Residential (Standard LAMC)			
Studio	3	1 space / unit	3
1 bedroom	54	1.5 spaces /unit	81
2 bedroom	15	2 spaces / unit	30

[44] *Maximum allowable floor area is calculated by multiplying the FAR by the lot area: 2.025 x 48,483 sf = 98,178 sf.*

[45] *LAMC § 12.22 A.25(f)(5).*

Subtotal (residential)			**114**
Residential (SB 1818)			
Studio and 1 bedroom	57 units	1 space / unit	57
2 bedroom	15 units	2 spaces / unit	30
Subtotal (residential)	**72 units**		**87**
Commercial			
Retail	13,000 sf	4 spaces / 1,000 sf	52
Restaurant	1,500 sf	10 spaces / 1,000 sf	15
Subtotal (commercial)	**14,500 sf**		**67**
Total Required (SB1818)			**154**
Total Required (Standard LAMC)			**181**

Source: Oakes & Associates, Architects AIA, November 12, 2013.
Table: CAJA Environmental Services, November 2013.

Table IV-15
Provided Parking

Type	Level P-2	Level P-1	Level 1	Mezzanine	Total
Standard Direct	35	28	3	14	**80**
Compact Direct	20	18	6	13	**57**
Standard Tandem	15	15	-	7	**37**
Compact Tandem	15	15	-	7	**37**
Accessible	0	4	3	0	**7**
Total	**85**	**80**	**12**	**41**	**218**

Source: Oakes & Associates, Architects AIA, November 12, 2013.
Table: CAJA Environmental Services, November 2013.

Table IV-16
Green Parking

Type	Level P-2	Level P-1	Level 1	Mezzanine	Total
Bicycle Parking (Short-Term) (5% of 154 spaces = 8 required)	0	0	31	32	**62**
Bicycle Parking (Long-Term) (Residential: 1 space/unit = 72 + 10% = 79)	41	30	4	9	**84**
Low-E Fuel Efficient Carpool/Vanpool (8% of 154 spaces = 13 required)	7	7	0	2	**16**
Stalls with 220/240 v. 40A grounded outlet (5% of 154 spaces = 8 required)	4	2	0	4	**10**

Source: Oakes & Associates, Architects AIA, November 12, 2013.
Table: CAJA Environmental Services, November 2013.

As such, the Project would provide sufficient parking to accommodate the anticipated demands of the Project. As a result, the Project would result in a less than significant impact with respect to parking.

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

No Impact. A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site and the surrounding area are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Project Site is currently undeveloped[46] and is located in an urbanized area of the Playa Del Rey community of the City of Los Angeles. Therefore, no impacts to any adopted habitat or conservation plans would occur as a result of the Project.

11. MINERAL RESOURCES

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

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction.

Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance.[47] Additionally, the Project Site is not located within an oil field or oil drilling area, and is not part of any Oil Drilling and Surface Mining Supplemental Use District.[48] Furthermore, no oil wells exist or are known to have previously existed on the Project Site or the surrounding area.[49] Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction. Therefore, no impacts with respect to mineral resources of regional or statewide significance would occur as a result of the Project.

---

[46] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

[47] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, Areas Containing Significant Mineral Deposits Map, September 1, 1996 and USGS Mineral Resources Data System: http://mrdata.usgs.gov/mineral-resources/mrds-us.html, accessed September 29, 2012.*

[48] *City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed September 29, 2012.*

[49] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://maps.conservation.ca.gov/doms/index.html, accessed September 29, 2012.*

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

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction.

The Project Site is located in the Playa Del Rey community and is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on or in the vicinity of the Project Site. Further, should any future mineral resources be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction. Therefore, no impacts with respect to loss of availability of a locally important mineral resource would occur.

12. NOISE

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

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

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

- L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- L_{max} – The maximum instantaneous noise level experienced during a given period of time.

- L_{min} – The minimum instantaneous noise level experienced during a given period of time.

- CNEL – The Community Noise Equivalent Level is a 24-hour average Leq with a 5 dBA "weighting" during the hours of 7:00 PM to 10:00 PM and a 10 dBA "weighting" added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour Leq would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA).

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

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[50]

---

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

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

Potentially Significant Unless Mitigation Incorporated. A discussion of the Project's noise impacts is included below.

Construction Noise

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

Construction of the Project would require the use of heavy equipment for demolition, grading and excavation to accommodate the building foundations, the installation of utilities, paving, and building fabrication. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise, especially during the building fabrication phase. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data for outdoor noise levels for typical construction activities, which are presented on Table IV-17. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

Table IV-17
Typical Outdoor Construction Noise Levels

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

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

During construction, ground clearing, grading, structural, and other activities at the Project Site would occur between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the City of Los Angeles Municipal Code (LAMC). These activities would increase ambient noise levels above 75 dBA at the apartments on Trolley Place south of the Project Site, the apartments on Convoy Street to the west of the Proposed Project, and at the single family residences on Montreal Street to the east of the Project Site (Table IV-18). There would also be an increase in ambient noise levels of 5 dBA or more at each identified receptor. However, there are several mitigation measures that can substantially reduce noise impacts during construction. Therefore, increased noise resulting from the construction of the Proposed Project would result in a less than significant impact with mitigation incorporated.

Table IV-18
Construction Noise Levels

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences on Trolley Place	62	81.1	55.8	81.1	25.3
Multi-family residences on Convoy Street	135	74.4	58.0	74.5	16.5
Del Rey Lagoon Park	250	66.0	55.2	66.4	11.2
Dockweiler State Beach Park	400	64.9	55.8	65.4	9.6
SOURCE: DKA Planning, 2013. Calculation sheets included as Appendix F to this IS/MND.					

Table IV-19
Mitigated Construction Noise Levels

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences on Trolley Place	62	58.1	55.8	60.1	4.3
Multi-family residences on Convoy Street	135	51.4	58.0	58.9	0.9
Del Rey Lagoon Park	250	43.0	55.2	55.5	0.3
Dockweiler State Beach Park	400	41.9	55.8	56.0	0.2
SOURCE: DKA Planning, 2013. Calculation sheets are included in Appendix F to this IS/MND.					

Following the mitigation measures provided below, construction noise at nearby sensitive receptors would be reduced to less than 75 dBA, with less than 5 dBA increases from existing ambient noise levels. Consequently, implementation of Mitigation Measures 12-1 through 12-8 would reduce construction noise impacts to less than significant levels.

Mitigation Measures

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

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Construction staging areas shall be as far from sensitive receptors as possible, particularly the apartments to the south of Trolley Place.
- Temporary sound barriers, capable of achieving a sound attenuation of at least 20 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding off-site residential, school, and church uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.
- Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.
- Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets.
- A noise disturbance coordinator shall be established to respond to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.
- All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

Operational Noise

During long-term operation of the Project, noise generated by vehicle travel to and from the Project Site was modeled under "future year (2015) no Project" scenario and "with Project" conditions utilizing the FHWA TNM 2.5 model. As shown in Tables IV-20 and IV-21, the greatest Project-related noise increase would be 1.1 dBA L_{eq} along Culver Boulevard between Pacific Avenue and Vista Del Mar Lane during the PM peak hour. The Project's noise impacts neither cause ambient noise levels at the property line of adjacent land uses to rise to the "normally unacceptable" or "clearly unacceptable" category nor result in any 5 dBA or more increase in noise level. As a result, vehicular noise impacts from operation of the Project would be considered less than significant.

Table IV-20
2015 Estimated AM Peak Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL		
	No Project (2015)	Project (2015)	Project Impact
Culver Boulevard from Pacific Avenue to Vista Del Mar Lane	60.6	61.1	0.5
Vista Del Mar from Trolley Place to Culver Boulevard	66.6	66.6	0.0
Vista Del Mar Lane from Culver Boulevard Northbound	58.0	58.2	0.2
Vista Del Mar Lane from Culver Boulevard to Montreal Street	57.8	57.9	0.1
Pershing Drive from Nicholson Street to Culver Boulevard	59.2	59.4	0.2
Pershing Drive from Nicholson Street to Manchester Avenue	66.3	66.3	0.0
Culver Boulevard from Nicholson Street to Pershing Drive	65.6	65.7	0.1

SOURCE: DKA Planning, 2013. Calculation sheets are provided in Appendix F to this IS/MND.

Table IV-21
2015 Estimated PM Peak Mobile Source Noise Levels

Roadway Segment	Estimated dBA, CNEL		
	No Project (2015)	Project (2015)	Project Impact
Culver Boulevard from Pacific Avenue to Vista Del Mar Lane	61.9	63.0	1.1
Vista Del Mar from Trolley Place to Culver Boulevard	66.8	66.9	0.1
Vista Del Mar Lane from Culver Boulevard Northbound	59.1	59.3	0.2

Vista Del Mar Lane from Culver Boulevard to Montreal Street	57.6	57.8	0.2
Pershing Drive from Nicholson Street to Culver Boulevard	59.8	60.0	0.2
Pershing Drive from Nicholson Street to Manchester Avenue	66.8	66.9	0.1
Culver Boulevard from Nicholson Street to Pershing Drive	65.8	66.0	0.2
SOURCE: DKA Planning, 2013. Calculation sheets are provided in Appendix F to this IS/MND.			

The Project would introduce mechanical equipment capable of producing audible noise during the operation of the Project. Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed ambient noise levels at adjacent property lines by more than 5 dBA. Large ground level heating, ventilation, and air conditioning (HVAC) systems typically generate noise levels between 50 and 65 dBA at 50 feet.[51,52] Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet.[53] The nearest sensitive land uses are residences located 62 feet south of the Project Site that would experience a 3.7 dBA increase in ambient noise if HVAC equipment were mounted at ground level, and 0.7 dBA increase if HVAC equipment were mounted on the roof of the Proposed Project. Both ground level and roof mounted HVAC equipment would not result in a 5 dBA noise increase. However, because ground level HVAC equipment would result in an audible noise increase of over 3 dBA, Mitigation Measures are recommended below. Because the incremental increase HVAC equipment would result in ambient noise increases of less than 5 dBA, stationary noise would be considered a less than significant impact.

Parking noise can typically generate an instantaneous noise level of up to an approximate 58.1 dBA at 50 feet.[54] Given the ambient noise levels of the surrounding sensitive receptors, the increase in noise at each sensitive receptor would be less than 3 dBA, and would not be audible. This potential noise impact is considered less than significant.

Finally, the Proposed Project would locate new noise-sensitive residences at the Project Site. A 24-hour CNEL noise measurement was performed to evaluate whether the existing ambient noise for the Project area is compatible for new residential uses. The existing CNEL in the Project area is approximately 68.1 dBA.[55] The California State Department of Health Services considers this existing sound level to be conditionally acceptable, which with conventional building construction and features such as closed

[51] *Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.*
[52] *To be conservative, a reference noise of 65 dBA at 50 feet was used in this analysis.*
[53] *Los Angeles Department of City Planning, Prepared by Impact Sciences, Inc., Androna Avenue Subdivision – Tentative Tract No. 53426 Subsequent Draft EIR, February 2010.*
[54] *Los Angeles Unified School District, Prepared by EDAW/AECOM, Final Environmental Impact Report Bell Education and Career Center, October 2009.*
[55] *Veneklasen Associates, 138 Culver Boulevard Exterior Envelope Acoustical Design Report, April, 2011.*

windows and fresh air supply system or air conditioning will normally suffice to mitigate impacts, as recommended in Mitigation Measures 12-10 through 12-12. This impact is considered less than significant with mitigation incorporated.

Mitigation Measures

Operation

XII-40. Increased Noise Levels (Parking Structure Ramps)

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

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

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

XII-170. Severe Noise Levels (Residential Fronting on Major or Secondary Highway, or adjacent to a Freeway)

- All exterior windows having a line of sight of a Major or Secondary Highway shall be constructed with double-pane glass and use exterior wall construction which provides a Sound Transmission Coefficient (STC) value of 50, as determined in accordance with ASTM E90 and ASTM E413, or any amendment thereto.
- The applicant, as an alternative, may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound insulation sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

XII-230. Increased Noise Levels

- The Proposed Project shall include double-paned windows on all of the exterior windows for each residential unit.
- All HVAC equipment shall be mounted on the roof of the Proposed Project instead of the ground level.
- The Proposed Project shall utilize central air conditioning and heating in each new residential unit.
- The Proposed Project shall include vegetation sound walls for any ground floor residential units (e.g., planting vegetation on the exterior of ground floor units to create a natural sound barrier).

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

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

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

Construction

As shown in Table IV-22, heavy equipment (e.g., vibratory roller) associated with construction would generate vibration levels of up to 0.089 peak particle velocity (ppv) at a distance of 25 feet. The nearest residential structures to the Project Site are approximately 62 feet from occasional heavy equipment activity and would experience vibration levels up to 0.023 inches per second. Vibration levels at these receptors would not exceed the potential building damage threshold of 0.3 inches per second. Construction activity would create approximately 75 VdB, and could exceed the 75 VdB annoyance threshold for residential land uses.

Table IV-22
Vibration Velocities for Construction Equipment

Equipment	PPV at 25 feet (Inches/Second)	Approximate L_V at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86

Jackhammer	0.035	79
Small Bulldozer	0.003	58
SOURCE: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.		

Mitigation Measures, provided below, would reduce construction related ground-borne vibration. After mitigation, construction activities would create a vibration annoyance level of approximately 74 VdB, and would not exceed the 75 VdB significance threshold at nearby sensitive receptors. Therefore, construction-related ground borne vibration impacts would result in a less than significant impact with mitigation incorporated.

Mitigation Measures

Construction

XII-230. Increased Noise Levels

- Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible.
- Construction haul trucks shall avoid driving over potholes and dips when arriving at or leaving the project site.
- The construction contractor shall stage and warm-up construction equipment as far from nearby sensitive receptors as possible.
- The noise disturbance coordinator shall be responsible for receiving local complaints about construction vibration. The noise disturbance coordinator shall determine the cause of the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices sent to the residential units within 500 feet of the construction site and all signs legible at a distance of 50 feet, at the construction site shall list the telephone number for the noise disturbance coordinator.

Operation

During operation of the Proposed Project, there would not be significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. However, Project-related traffic vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less than significant impact.

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

Less Than Significant Impact. During long-term operation of the Project, noise generated by new vehicle trips was modeled under future year (2015) no project and with project conditions utilizing the FHWA TNM 2.5 model. As described above, the greatest Project-related noise increase would be 1.5 dBA L_{eq} along Culver Boulevard between Pacific Avenue and Vista Del Mar Lane. The Project's noise impacts would not cause the ambient noise level measured at the property line of the affected uses to rise to the "normally unacceptable" or "clearly unacceptable" category or result in any 5-dBA or more increase in noise level. As a result, vehicular noise would result in a less than significant impact.

Noise impacts from parking would not expose residents or future employees to excessive noise levels, nor would stationary equipment (e.g., air handlers, exhaust fans), which would only increase noise levels at nearby residential uses by 0.7 dBA after mitigation. This incremental increase would not be audible, and stationary noise would result in a less than significant impact.

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

Potentially Significant Unless Mitigation Incorporated. As noted in Section 12(a), the Proposed Project would create significant increases in ambient noise exceeding 75 dBA at the adjacent apartments at on Trolley Place. However, implementation of Mitigation Measures 12-1 through 12-9 would reduce construction noise impacts at nearby sensitive receptors to less than 75 dBA, less than a 5 dBA increase from existing ambient noise levels. Therefore, implementation of the Mitigation Measures in this section would reduce construction noise impacts to less than significant levels.

Mitigation Measures

XII-230. Increased Noise Levels

- Construction staging areas shall be as far from sensitive receptors as possible, particularly the apartments to the south of Trolley Place.
- All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices.
- Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to the immediate surrounding off-site residential, school, and church uses that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period.
- Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors.
- A noise disturbance coordinator shall be established to respond to local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. All

notices that are sent to residential units within 500 feet of the construction site and all signs, legible at a distance of 50 feet, at the construction site shall list the telephone number for the disturbance coordinator.

- All residential units located within 2,000 feet of the construction site shall be sent a notice informing the residences of the construction schedule of the Proposed Project. A sign shall also be posted at the construction site notifying residences of construction activities. All notices and signs shall display the dates of construction activities, as well as provide a telephone number where residents can contact the noise disturbance coordinator about the construction process and register complaints.

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

Less Than Significant Impact. The Proposed Project would be located about one mile northwest from the Los Angeles International Airport, a public airport operated by Los Angeles World Airports. However, according to the LAX *2009 Third Quarter Noise Report*, the project lies outside of the 65 CNEL contour.[56] While aircraft approaching and leaving the airport do contribute to ambient noise levels, the predominant noise source for existing residents and future workers is vehicular traffic.

As noted in Section 12(a), the Proposed Project would expose existing residents to significant increases in ambient noise exceeding 75 dBA at the adjacent apartments at Trolley Place. However, implementation of the Mitigation Measures in this section would reduce construction noise impacts at nearby sensitive receptors to less than 75 dBA, less than a 5 dBA increase from existing ambient noise levels. Therefore, implementation of the Mitigation Measures in this section would reduce construction noise impacts to less than significant levels and would ensure that any operational noise would be considered less than significant for adjacent sensitive receptors. Overall, impacts would be less than significant.

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

No Impact. The Project Site is not located in the vicinity of a private airstrip. As no such facilities are located in the vicinity of the Project Site and no impact would occur.

13. POPULATION AND HOUSING

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

[56] *Ibid.*

Less Than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the Project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. The unemployment rate for construction jobs was 11.4% in December 2013.[57] Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts would not result from construction of the Project. Therefore, construction-related population growth impacts would be less than significant.

Operation

The Project would develop 72 residential units and 14,500 sf of commercial space including 13,000 square feet of retail and 1,500 square feet of restaurant uses. Employee generation is shown in Table IV-23 and population generation is shown in Table IV-24. It is estimated that the Project would generate an increase of approximately 148 residents and an increase of approximately 20 employees.

Table IV-23
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Commercial	14,500 sf	1.4 employees / 1,000 sf	20
Note: sf = square feet *Source: LAUSD School Facilities Fee Plan, March 2, 2000.* *Table: CAJA Environmental Services, November 2013.*			

Table IV-24
Project Estimated Population Generation

Land Use	Size	Population Generation Rates	Total Population
Residential	72 DU	2.05 persons / DU	148
Note: DU = Dwelling unit *Source: LA Planning, Demographics and Research Unit, Westchester – Playa Del Rey: Persons Per Renter Occupied Unit* *Table: CAJA Environmental Services, September 2012.*			

[57] *Bureau of Labor Statistics: http://www.bls.gov/iag/tgs/iag23.htm, accessed January 24, 2014.*

Localized Growth Forecasts

Table IV-25 shows the City Planning Department's planned growth in population, housing, and employment to 2025 for the Westchester-Playa Del Rey Community Plan.[58]

Table IV-26, Population and Housing in the City Los Angeles, shows the California Department of Finance population and housing for the City in 2010 and 2013.[59]

Table IV-27 shows the 2012 Southern California Association of Government's (SCAG) planned growth of the City of Los Angeles in population, housing, and employment to 2020.

The Project's 148 residents, 20 employees, and 72 new dwelling units would be well within estimates of growth for the Community Plan Area. The Project would therefore result in a less than significant impact with respect to population, housing, and employment growth.

Table IV-25
Population, Housing and Employment for Westchester-Playa del Rey Community Plan

Condition	Population	Housing (DU)	Employment
2000	51,255	22,507	62,628
2025	93,841	46,950	72,551
Difference	*+42,586*	*+24,443*	*+9,923*

Source: Westchester-Playa del Rey Community Plan Update, Draft EIR (SCH No. 2002061090), Table 4.2-2
Table: CAJA Environmental Services, September 2012.

Table IV-26
Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2008	3,770,500	1,309,900	1,735,200
2020	3,991,700	1,455,700	1,817,700
Change (2008-2020)	+221,200	+145,800	+82,500

SCAG 2012 Adopted Growth Forecast:
http://www.scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf
Table: CAJA Environmental Services, August 2013.

[58] *Westchester Playa del Rey Community Plan Update, Draft EIR (SCH No. 2002061090), Table 4.2-2*
[59] *State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013. Sacramento, California, May 2013: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php.*

Table IV-27
Population and Housing in the City Los Angeles

	2010	2013	Change 2010-2013
Population	3,792,621	3,863,839	+71,218 (+1.9%)
Housing Units	1,412,006	1,425,372	+13,366 (+0.9%)

2010: Census data, reported 4/1/2010
2013: Estimate 1/1/2013
State of California, Department of Finance, E-5 *Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2013. Sacramento, California, May 2013:* http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php
Table: CAJA Environmental Services, December 2013.

Housing Element

The City is currently updating its Housing Element portion of the General Plan for the period of 2013-2021. A draft dated September 17, 2013 was considered by the City Planning Commission on September 26, 2013. On November 5, 2013, the Housing Element was recommended for approval at a joint hearing of the Planning and Land Use Management (PLUM) and Housing Committers of the City Council (CPC-2013-1318-GPA).[60] On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.[61]

The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.[62]

The Housing Element has identified 371 sites (291.7 acres) in the Westchester Community Plan Area as having the housing capacity for 12,645 net units.[63]

---

[60] *City of Los Angeles, Housing Element, 2013-2021:* https://sites.google.com/site/lahousingelement/
[61] *City of Los Angeles, Housing Element, 2013-2021:* https://sites.google.com/site/lahousingelement/
[62] *City of Los Angeles, Housing Element, 2013-2021:* https://sites.google.com/site/lahousingelement/
[63] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.*

The Project would add 72 residential units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[64] The Project would further the goals and objectives of the Housing Element by providing additional housing stock.

Infrastructure

The Project Site is currently undeveloped,[65] but is surrounded on all sides by paved roads and further development in the area, including housing to the south and commercial buildings to the north.

Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. As development of the Project would not induce substantial population growth and would be supported by the existing infrastructure, impacts would be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. There is no housing on the Site. The Project would not result in the displacement of any existing housing units, and as such, no impact would occur.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. There is no housing on the Site. The Project would not result in the displacement of any people, and as such, no impact would occur.

14. PUBLIC SERVICES

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

---

[64] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.*

[65] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

Potentially Significant Unless Mitigating Incorporated. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07, the maximum response distance between an industrial/commercial land use and a LAFD station that houses an engine company is one mile, and a truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.[66]

The Project Site is served by LAFD Station No. 67, located at 5451 Playa Vista Drive, approximately 1.7 miles south of the Project Site.[67] Because the response distance exceeds the 1.5 miles, the structure shall, consistent with standard City requirements, include automatic fire sprinkler system.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e. Jefferson Boulevard and Culver Boulevard). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing.[68]

As a High Density Residential/Neighborhood Commercial land use, the Project would require 4,000 gallons per minute from four fire hydrants flowing simultaneously at a minimum residual water pressure of 20 psi.[69] The following fire hydrants are on the Project Site:[70]

- Hydrant (ID 36779, size 2½ x 4D, 6" inch main), southwest corner Trolley Place / Culver Boulevard;
- Hydrant (ID 37503, size 2½ S, 6" main), east side of Site, on Vista Del Mar.

Thus additional fire hydrants would need to be installed as part of the Project, to comply with LAFD requirements of having four fire hydrants flowing simultaneously.

---

[66] *LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html, accessed July 16, 2012.*
[67] *LAFD website: http://lafd.org/find-a-fire-station/275-fire-station-locator, accessed September 28, 2012.*
[68] *LAMC Sec. 57.09.06, Fire Flow: http://lafd.org/prevention/hydrants/division_9_fc.html, October 2, 2012.*
[69] *LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html, accessed October 2, 2012.*
[70] *Navigate LA, City of Los Angeles, Bureau of Engineering, DWP (Fire Hydrants) Layer: http://navigatela.lacity.org/index01.cfm, accessed October 2, 2012.*

As required prior to approval, the Project would submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the Project area is sufficient to serve the Proposed Project. If the pressure is insufficient, upgrades to the existing infrastructure would be necessary.

Mitigation Measures

XIV-10. Public Services (Fire)

- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

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

Potentially Significant Unless Mitigating Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

The Project Site is currently served by the City of Los Angeles Police Department's (LAPD) Pacific Community Police Station, located at 12312 Culver Boulevard, which is approximately 2.9 miles northeast of the Project Site. The Pacific Community Police Station is under the jurisdiction of the West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire areas. The Pacific Community Police Station service area encompasses approximately 200,000 persons in approximately 24.1 square miles.[71]

Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 1472.[72] Crime statistics for the Pacific Area and Citywide are shown in Table IV-28.

---

[71] *Los Angeles Police Department, Pacific Community Police Station, website: http://www.lapdonline.org/pacific_community_police_station/content_basic_view/1738, September 28, 2012*

[72] *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 138 Culver, website: http://zimas.lacity.org/, accessed September 28, 2012.*

Table IV-28
Reported Crimes in the Pacific Area and Citywide

Crime	Pacific[1]			Citywide[2]		
	YTD 2012	YTD 2011	% Change	YTD 2012	YTD 2011	% Change
Homicide	5	6	-17	212	214	-1
Rape	21	24	-13	570	545	+5
Robbery	222	213	+4	6,508	7,317	-11
Aggravated Assaults	168	178	-6	6,216	6,562	-5
Violent Total	**416**	**421**	**-1**	**13,506**	**14,638**	**-8**
Burglary	836	899	-7	11,379	12,170	-6
Grand Theft Auto	590	543	+9	10,514	11,135	-6
Burglary from Vehicle	1,076	1,037	+4	19,037	18,320	+4
Personal/Other Theft	1,389	1,601	-13	20,068	19,828	+4
Property Total	**3,891**	**4,080**	**-5**	61,608	61,453	0
Crime Total	***4,307***	***4,501***	***-4***	***75,114***	***76,091***	***-1***

YTD refers to year-to-date: January through the week ending September 22 of that year.
Percentages with + show an increase in YTD crime 2012 compared to 2011.
[1]http://www.lapdonline.org/assets/pdf/pacprof.pdf, access October 2, 2012.
[2]http://www.lapdonline.org/assets/pdf/cityprof.pdf, accessed October 2, 2012.
Table: CAJA Environmental Services, October 2012.

Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention.

The Project applicant would employ construction security features, such as fencing the perimeter of the construction area, which would serve to minimize the need for LAPD services and prevent trespassing and theft during Project construction. This would ensure that impacts to police protection services as a result of Project construction remain less than significant.

Operation

Development of the Project would include construction of new residential and commercial uses. As such, the Project could potentially increase in the number of police service calls due to an increase in onsite residents, employees and customers.

The potential for crime can be reduced with site-specific designs and features, which would be incorporated into the Project. These features may include, but are not limited to, access control to the 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. The Project would include standard residential and commercial security measures such as adequate security lighting, surveillance cameras, anti-theft devices in retail stores, and secured parking and gate access for residents. Compliance with the Mitigation Measures in this section would result in a less than significant impact with respect to police protection services, and the Project would not require the construction of a new or expanded police station.

Mitigation Measure

XIV-20. Public Services (Police – Demolition/Construction Sites)

- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

XIV-30. Public Services (Police)

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

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

Potentially Significant Unless Mitigating Incorporated. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school

facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:[73]

- Paseo Del Rey Natural Science Magnet Elementary School, located at 7751 Paseo Del Rey;
- Loyola Village Elementary School, located at 8821 Villanova Avenue;
- Kentwood Elementary, located at 8401 Emerson Avenue;
- Wright Middle School, located 6550 W. 80th Street;
- Westchester Enriched Sciences Magnet, located at 7400 Manchester Avenue; and
- Venice High School, located at 13000 Venice Boulevard.

As shown in Table IV-29, the Project would have 72 residential units and would generate 29 students.

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620.

Table IV-29
Project Estimated Student Generation

Land Use	Size	Elementary[1]	Middle[2]	High[3]	Total
Multi-Family	72 DU	15	7	7	29

Note: sf = square feet; the totals have been rounded to the nearest whole number.
[1]Elementary: 0.2042 stu/du
[2]Middle: 0.0988 stu/DU
[3]High: 0.0995 stu/DU
Source (rates): LAUSD, Student Generation Rate Calculation, August 2006.
Table: CAJA Environmental Services, October 2012.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding

[73] *LAUSD, School Finder: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed October 3, 2012.*

any contrary provisions in CEQA, or other state or local law. Per Government Code Section 65995.5 and 65995.6, LAUSD has imposed developer fees at a rate of:[74]

- $3.87 per square foot of assessable space (residential);
- $0.47 per square foot of chargeable and enclosed space (commercial/industrial);
- $0.28 per square foot of chargeable and enclosed space (storage); and
- $0.07 per square foot of (parking structure).

Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, the Project would result in a less than significant impact with respect to schools.

Mitigation Measures

XIV-60. Public Services (Schools)

- The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. A half-mile radius is the standard service radius for neighborhood parks; a two-mile radius is the standard service radius for community parks.[75] Table IV-30 shows the parks and recreation centers that are located nearby the Project Site according to LADRP's facility locator.

---

[74] *Developer Fee Rates within LAUSD, from Developer Fee Program Office, effective October 23, 2011 through October 22, 2012.*

[75] *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Chapter 2.14: Recreation and Open Space, January 19, 1995, page 2.14-2.*

In addition, the Pacific Ocean and public beaches are located one block west of the Project Site. The Marina Del Rey Harbor (a County facility) is nearby.

Table IV-30
Los Angeles Parks and Recreation Center

Name	Address	Notes
Del Rey Lagoon	6660 Esplanade Place	Lagoon, Baseball
Titmouse Park	415 Culver Boulevard	0.23 acres
Vista Del Mary Park	Century and Vista Del Mar	BBQ Pits, Picnic, Play Area
Westchester Recreation Center	7000 Manchester Avenue	Auditorium, barbecue pits, baseball diamond (lighted), basketball courts (lighted/outdoor, unlighted/indoor), children's play area, community room, football field (lighted), indoor gym (without weights), picnic table, seasonal pool (outdoor/ unheated), soccer field (lighted), tennis courts (lighted).

Source: Los Angeles Department of Recreation and Parks facility locator website: http://www.laparks.org/dos/parks/parks.htm
Table: CAJA Environmental Services, October 2012.

The City requires developers to dedicate parkland or pay fees in lieu of parkland dedication. If the proposed onsite open space and recreation facilities do not fully satisfy the above requirements, the developer would be required to pay Recreation and Park Fees to the City to satisfy the balance of its obligations. Pursuant to Section 21.10 of the LAMC, the Project Applicant would pay the Dwelling Unit Construction Tax for construction of apartment buildings. Therefore, impacts to parks and recreational facilities would be less than significant.

Mitigation Measures (also included in Section 15 Recreation)

XV-10. Recreation (Increased Demand for Parks or Recreational Facilities)

- (Apartments) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity of the facility to serve the community. The

City of Los Angeles Public Library (LAPL) provides library services throughout the City. The Project Site is near two libraries:[76]

- Playa Vista Library, located at 6400 Playa Vista Drive; and
- Westchester-Loyola Village Library, located at 7114 West Manchester Avenue.

The Project would generate a net increase of approximately 148 residents and 20 employees. However, employees of commercial development do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. Based on criteria contained in the Library Branch Facilities Plan, the Playa Vista Library has capacity to serve between 35,001 to 50,000 people and the Westchester-Loyola Village Library has capacity to serve between 50,001 to 100,000 people. Therefore, the additional residents generated by the Project would not substantially affect the libraries, such that a new or expanded facility would be required. Therefore, impacts to libraries would be less than significant.

The project does not propose any significant increase in population density that would generate the need to require new roads, additional infrastructure, or other governmental services. However, the property owner will be required to make dedications and improvements to Vista Del Mar, Culver Boulevard, and Trolley Place as a result of increased traffic generation. Damage may be incurred to the roadway adjacent to the property as a well. However, compliance with the mitigation measures outlined in Section 16 Transportation and this section will reduce any potential impacts to a less than significant level.

Mitigation Measures

XIV-70. Public Services (Street Improvements Not Required By DOT)

- The project shall comply with the Bureau of Engineering's requirements for street dedications and improvements that will reduce traffic impacts in direct portion to those caused by the proposed project's implementation.

XIV-80. Construction Damage Bond

- A cash bond or security ("Bond") shall be posted in accordance with terms, specifications, and conditions to the satisfaction of the Bureau of Engineering and shall remain in full force and effect to guarantee that any damage incurred to the roadway adjacent to the property, which may result from any construction activity on the site, is properly repaired by the applicant.
- Prior to the issuance of a Certificate of Occupancy, any damage incurred to the roadway adjacent to the property, which may result from any construction activity on the site, shall be properly

[76] *Los Angeles Public Library, Branch Map: http://www.lapl.org/branches/branch_map.pdf, October 3, 2012.*

repaired by the applicant to the satisfaction of the Bureau of Engineering. The applicant is hereby advised to obtain all necessary permits to facilitate this construction/repair.

15. RECREATION

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

Potentially Significant Unless Mitigated. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project would generate 148 residents and 20 employees. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use parks or recreation centers near their homes during non-work hours.

The Project would include LAMC-required or above square feet of open space, including common and private open spaces. The Project would provide a total of 5,062 square feet of common open space (58 percent) and 3,600 square feet of private open space (42 percent). This is 1,087 square feet above the 7,575 square feet of required open space. The second floor would include a 2,166 square foot club and fitness room, a pool and spa, and a 2,896 square foot pool area. These recreation and open spaces would be available for residents if they choose, rather than visiting nearby parks.

While the increase in residents as a result of the Proposed Project may lead to physical deterioration of facilities or accelerate deterioration, pursuant to Section 21.10 of the LAMC, the Project Applicant would pay the Dwelling Unit Construction Tax for construction of apartment buildings. The payment of these Recreation and Park Fees would be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore compliance with the Mitigation Measures in this Section would reduce any potential impacts to a less than significant level.

Mitigation Measures (also included in Section 15 Recreation)

XV-10. Recreation (Increased Demand for Parks or Recreational Facilities)

- (Apartments) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the

environment. The Project would include LAMC-required or above square feet of open space, including common and private open spaces.

While the increase in residents may lead to physical deterioration of facilities or accelerate deterioration, pursuant to Section 21.10 of the LAMC, the Project Applicant would pay the Dwelling Unit Construction Tax for construction of apartment buildings. The payment of these Recreation and Park Fees would be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, less than significant impacts would occur.

16. TRANSPORTATION AND TRAFFIC

The following analysis is based on:

- Traffic Impact Analysis Report, Proposed 72-Unit Residential and 16,000 Square Foot Commercial Mixed-Use Development, prepared by Hirsch/Green Transportation Consulting, Inc, dated March 2011 (Appendix G.1 to this IS/MND).

- Supplemental Traffic Impact Analyses for Revisions to Approved Residential and Commercial Mixed-Use Project at 138 Culver Boulevard in the Playa del Rey Community of the City of Los Angeles, prepared by Hirsch/Green Transportation Consulting, Inc, dated September 30, 2013 (Appendix G.2 to this IS/MND).

- City of Los Angeles, Memorandum from Department of Transportation to Department of City Planning, November 15, 2013 (Appendix G.3 to this IS/MND).

Introduction

The scope of the traffic study was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT) to ensure that appropriate analysis methodologies and assumptions were utilized. Based on LADOT's recommendations, the traffic study evaluates the existing (year 2010) and forecast future (year 2015) conditions at six signalized intersections adjacent to, or in close proximity to, the Project Site during both the AM and PM peak hours. These intersections, listed below, represent the locations most likely to be affected by traffic generated by the Proposed Project.

1. Vista Del Mar/Culver Boulevard and Vista Del Mar/Montreal Street

2. Culver Boulevard and Nicholson Street

3. Culver Boulevard and Jefferson Boulevard

4. Pershing Drive and Pershing Drive/Cabora Drive

5. Manchester Avenue and Pershing Drive

6. Vista Del Mar and Waterview Street

Additionally, potential Project impacts on Pershing Drive, south of Culver Boulevard, were also investigated, due to its potential for use by Project-related traffic as a local street access route between the Project Site and the surrounding arterial roadway network.

Supplemental Introduction

The Los Angeles Department of Transportation (LADOT)'s assessment letter (dated September 22, 2011) confirmed the results of the March 2011 Traffic Study (original traffic study). However, subsequent to LADOT's approval of the original traffic study, the Project was revised to reduce the overall retail/commercial area, from 16,000 to 14,500 square feet, including the removal of the previously-proposed supermarket use and the reduction of the proposed restaurant/café space (from 3,000 to 1,500 total square feet), although the revised Project would continue to provide a total of 72 apartment units, again including eight very-low income units. These changes collectively will be called the Revised Project throughout this section. Therefore, a supplemental traffic analysis was prepared to analyze the impacts of the Revised Project with respect to traffic, and the Revised Project's supplemental analysis is layered on top of the original traffic study in this section of the IS/MND.

Description of Revised Project

While the Site's vehicular access would continue to be provided from Pacific Avenue, it is anticipated that the revised Project's parking scheme could include a new mezzanine parking level, which would be accessed via a second driveway, designated for use by Project residents only, along the Site's Pacific Avenue frontage.

The purpose of the Supplemental Analyses is to provide LADOT with adequate information and supporting analyses to make a determination regarding the potential trip generation and its associated traffic impacts on the previously-approved March 2011 Traffic Study.

Although the revisions described above would not substantially change the general Project characteristics from those analyzed in the March 2011 Traffic Study, the overall reduction in the Project's commercial component size, particularly the removal and/or reduction in size of the relatively high trip generating supermarket and restaurant uses, would result in a decrease in the number of net Project-related trips as compared to that noted in the March 2011 Traffic Study.

This reduction in Project traffic is important, since the originally-analyzed Project resulted in a significant, albeit "threshold", impact (+ 0.023 at LOS D) at the intersection of Culver Boulevard and Nicholson Street, requiring an extensive improvement to that location, and to several surrounding roadways, in order to mitigate.

Because the anticipated reductions in Project-generated traffic could be sufficient to reduce the revised Project's incremental impact at the subject intersection to less-than-significant levels, and thereby eliminate

the need for any mitigation measure, the supplemental analysis has been prepared to evaluate and document the potential traffic effects of the revisions to the Project. To summarize the results of those analyses, the revised Project would result in somewhat lower net trip additions to the surrounding roadway system than the originally-proposed Project, with approximately 220 fewer daily trips, including 16 fewer (10 inbound, six outbound) trips during the AM peak hour, and 30 fewer (19 inbound, 11 outbound) trips during the PM peak hour.

However, this slightly lower number of project trips would reduce the previously-identified impact at Culver Boulevard and Nicholson Street to less than significant, and as a result, the mitigation measure originally recommended for that location would no longer be needed. No other significant Project-traffic related impacts would occur.

Traffic Impact Analysis Study Area

Area Transportation Facilities

The Project area is served by both local and regional transportation facilities, including two freeways, although direct access to the immediate Project vicinity is limited due to the presence of LAX and Marina Del Rey. North-south regional access through the study area is provided by the San Diego Freeway (I-405), while the Marina Freeway/Expressway (SR-90) provides regional access between the San Diego Freeway and the Marina Del Rey area immediately north of the Project vicinity. In addition to the regional freeway facilities, several major and secondary arterials serve the study area, as does a relatively well-developed local street grid, although some roadways are discontinuous due to the area freeways, LAX, Marina Del Rey, and other development in the area.

The following major and secondary highways serve the Project study area:

- Culver Boulevard
- Jefferson Boulevard
- Manchester Avenue
- Pacific Avenue
- Pershing Drive
- Vista Del Mar

In addition to the major and secondary highways mentioned above, the following local and collector streets serve the Project study area:

- Nicholson Street

- Cabora Drive
- Waterview Street

Public Transportation

Although the Project study area is served by a number of bus lines, only one serves the Project Site directly. Most of the bus lines within the study area are operated by the Los Angeles County Metropolitan Transportation Authority ("Metro"), which is the primary service provider in the City of Los Angeles, although other transit providers such as the Santa Monica Big Blue Bus and Culver City Transit also serve the area surrounding the Project Site. None of the bus lines operated by these other providers are located close enough to the Project Site to be used directly, but most are accessible via transfers from the Metro buses. Overall, these bus lines include many local-serving lines providing multiple stops throughout the Project vicinity, as well as long distance commuter and express bus lines providing direct or convenient regional transit access between the Project vicinity and the larger regional area.

Metro Line 115 provides the only direct service to the Project Site, running primarily along Manchester Avenue/Firestone Boulevard between its western terminus loop along Pacific Avenue/Esplanade in the Playa Del Rey area and its eastern terminus loop along Studebaker Avenue at the Norwalk Transit Station. In the immediate Project vicinity, Line 115 provides weekday service from approximately 5:45 AM to 10:15 PM, with approximately 30- to 40-minute headways during the peak hours, increasing to approximately one hour during off-peak periods.

Thus, while the Project Site is not well served by transit operations, Metro Line 115, providing the only direct service to the Site, does allow for connections to a number of different public transit facilities serving the general area surrounding the Project Site as well as the larger metropolitan Los Angeles area. As such, it is possible that some of the Project's residents, guests, patrons, or employees could utilize these public transit facilities. However, in order to provide a conservative analysis of the Project's potential traffic impacts, no significant transit utilization was assumed for the Project beyond those nominal levels intrinsically included in the baseline trip generation rates used to estimate Project trips.

Existing Highway System Improvements

All of the signalized intersections in the study area, including the six study intersections identified above, are improved with LADOT's Automated Traffic Surveillance and Control ("ATSAC") as well as the next-generation Adaptive Traffic Control System ("ATCS") traffic signal coordination systems. These automated and adaptive signal coordination systems enhance the overall capacity of a network of interconnected traffic signals by monitoring the traffic flow patterns and vehicular demands at adjacent ATSAC/ATCS-equipped intersections and adjusting the signal timing and phasing schemes in real time throughout the entire signal network to maximize vehicular throughput and minimize delay along key transportation corridors.

Ongoing or Programmed Future Highway System Improvements

Many traffic control enhancements are already implemented at critical points within the existing highway network serving the proposed development, including left-turn channelization and other traffic control measures, indicating very good use of the existing highway facilities, and as noted above, LADOT has implemented ATSAC/ATCS traffic signal synchronization at all signalized intersections in the Project vicinity, including each of the six intersections analyzed in the study. No other significant highway improvements within the study area were identified in the City of Los Angeles Five Year Capital Improvements Program ("CIP") for implementation by the anticipated 2015 completion date of the Proposed Project.

Project Traffic Generation

Traffic-generating characteristics of many land uses, such as the residential apartment units and retails uses comprising the Proposed Project have been extensively surveyed and documented in studies conducted under the auspices of the Institute of Transportation Engineers (ITE). The most recent information is available in the ITE 8th Edition *Trip Generation* manual. The trip generation data contained in the ITE manual are nationally recognized, and are used as the basis for most traffic studies conducted in the City of Los Angeles.

However, the Project Site is located within the jurisdiction of the Coastal Transportation Corridor Specific Plan (CTCSP, City of Los Angeles Ordinance No. 168,999), which identifies traffic management and analysis strategies specifically tailored for the coastal portion of the City of Los Angeles for the area generally bounded by the City of Santa Monica on the north, the City of El Segundo on the south, and the San Diego (I-405) Freeway on the east. The CTCSP defines PM peak hour trip generation rates for a variety of land uses, including the Proposed Project's apartment, retail, restaurant, and market uses. LADOT requires the use of the CTCSP trip generation rates where applicable, and therefore, these rates were used in this analysis. Daily and AM peak hour trip generation rates are not identified in the CTCSP, and therefore, LADOT recommended using the applicable 8th Edition ITE trip generation rates to estimate the Project's trip generation during these time periods.

However, the "baseline" ITE trip generation rates are usually derived from actual counts of vehicles entering and exiting the driveways of the subject land uses, and do not generally account for factors that influence the amount of "net" traffic generation for the developments. For typical mixed-use residential/commercial developments, the most pertinent of these factors involve the effects of "internal interaction" and/or pedestrian "capture," and "pass-by" traffic on the estimates of "net" new traffic added to the area roadways.

Internal interaction reflects the use of on-site services and amenities by other patrons or residents of the Site. It is expected that some residents of the new development would shop at the Project's ground floor retail and market facilities, or dine in the on-site restaurant/café. This use by residents of the Project itself would reduce the number of vehicle trips traveling to and from the Site. The internal interaction adjustment also includes consideration of "multi-purpose" trips, where patrons of one retail store shop at other stores or fine at the Site during a single trip. This factor reduces the traffic generation of a mixed-use development

as compared to that of individual "stand alone" uses, as generally identified in the ITE data. Additionally, the Project's proposed retail, restaurant, and market components would provide local-serving facilities within convenient walking distance of nearby neighborhoods. The ability of area non-Project residents to walk to nearby shopping and dining establishments reduces vehicle traffic, not only to and from the Site, but throughout the area, as area residents no longer need to drive out of the immediate area to shop at other stores. For purposes of this analysis, based on the sizes and uses of the Proposed Project's commercial facilities, it was assumed that the Project's retail and restaurant components would exhibit an approximately 10 percent reduction in traffic due to the combined effects of Project resident utilization (5 percent) and walk-in patronage (5 percent) from nearby residential neighborhoods, while the market component would experience an approximately 15 percent total trip reduction (5 percent reduction for Project resident utilization and 10 percent reduction for non-Project area resident walk-in patronages).

The second adjustment acknowledges the effects of pass-by activity on the Project's traffic generation. The concept of pass-by traffic adjustments involves the "capture" of an existing trip passing by the Project Site. These existing trips are already on the area roadway network for other purposes, such as a trip to and from work, or perhaps to or from other shopping destinations. As these trips pass by the Project Site, the specific convenient facilities provided by the Project, or other factors produces a stop at the Site. Such activity is considered to be an interim stop along a trip which existed without the development of the Project, and therefore, vehicles making these stops are not considered to be newly generated Project-related traffic.

LADOT has developed a series of recommended pass-by trip reduction percentages for various development types and sizes. Based on these recommendations, it was assumed that the proposed ground floor retail component of the Project would exhibit an approximately 50 percent pass-by trip reduction from the baseline ITE trip generation rates. Similarly, the proposed restaurant/café use would experience approximately 20 percent of their total traffic due to pass-by trips, while a 40 percent pass-by trip reduction was considered appropriate for the proposed market component of the Project.

It is also of note that the standard ITE trip generation rates and equations used to develop the trip estimates for the proposed residential component of the Project are based on typical "market rate" residential units. The ITE does not include specific trip generation profiles for "affordable" or "low income" residential units. Although not extensively documented, it is generally acknowledged that low-income residential developments generate traffic at a lower "per unit" ratio than do market rate developments, due primarily to lower per capita vehicle ownership and a higher reliance on public transit or other non-vehicular means of transportation, thereby reducing the actual trip generation of the Project. Therefore, for purposes of this assessment, the more conservative trip generation equations for typical (market rate) apartment uses were used to calculate the trip generation potential for all of the 72 apartment units proposed for the Project, including the eight very-low income units. This assumption is expected to produce a "worst case" assessment of the net new traffic from the low-income residential component of the Proposed Project, and as a result, for the overall Project as well.

Revised Project Trip Generation

As described in the approved March 2011 Traffic Study, the trip generation rates used to calculate the traffic-generating characteristics of the originally-proposed Project were generally obtained from the Institute of Transportation Engineers ("ITE") 8th Edition *Trip Generation* manual.[77] However, as also detailed in that earlier study, the Project Site is located within the jurisdiction of the Coastal Transportation Corridor Specific Plan ("CTCSP", City of Los Angeles Ordinance Number 168,999), which identifies PM peak hour trip generation rates for a variety of land uses, including the Proposed Project's apartment uses. As required by LADOT, the CTCSP trip generation rates were used to estimate the original Project's trip generation during this time period, although the 8th Edition ITE trip generation rates were used to estimate the Project's trip generation during the daily (24-hour) and AM peak hour time periods. Information from the ITE manual was also used to identify the PM peak hour inbound/outbound traffic directional characteristics; as noted above, the CTCSP provides the PM peak hour trip rates for various uses, but the directional traffic characteristics are not identified.

Therefore, to provide consistency between the supplemental analysis and the trip generation estimates identified in the March 2011 Traffic Study for the previous Project, the appropriate CTCSP and 8th Edition ITE trip generation rates and assumptions from that study were again used to calculate the trip generation for the modified Project's "apartment" and "restaurant" uses. As also described in the approved traffic study, in order to provide the maximum flexibility for the developer in leasing the development, the 7,000 square foot "retail" component of the previous Project was evaluated using the most conservative (e.g., highest) possible trip generation rate for such uses, and was assumed to be a "shopping center," resulting in a CTCSP PM peak hour trip generation rate of 14.60 trips per 1,000 square feet.

However, the revised Project is no longer envisioned to operate as a "shopping center" development, and would provide more site and local-serving retail and commercial uses than were anticipated as part of the originally-proposed Project. As a result, the 13,000 square foot retail floor area for the modified Project was assumed to consist of a combination of "specialty" retail (7,000 square feet) and "other" retail (6,000 square feet) uses, as specifically defined in the CTCSP and/or otherwise accepted by LADOT and the City; the Project applicant is aware of and has agreed to abide by these use restrictions. Note that the trip generation estimates for the "specialty retail" component of the modified Project utilize the ITE "Specialty Retail Center" and CTCSP "Specialty Retail" data, while the "other retail" component is evaluated using the ITE "Shopping Center" trip generation rates for the daily (24-hour) and AM peak hour calculations, but utilize the CTCSP "Other Retail" trip rates for the PM peak hour trip generation estimates. The ITE and CTCSP trip generation rates used in this supplemental study to estimate the number of trips generated by the modified Project are summarized below:

Apartment – per dwelling unit (ITE Land Use 220)
Daily Trips: T = 6.65 (U)

[77] *Trip Generation, 8th Edition, Institute of Transportation Engineers, Washington, D.C., 2008.*

AM Peak Hour: T = 0.51(U); I/B = 20%, O/B = 80%
PM Peak Hour: T = 0.70(U); I/B = 65%, O/B = 35%

Specialty Retail Center – per 1,000 gross square feet of floor area (ITE Land Use 814)
Daily Trips: T = 44.32 (A)
AM Peak Hour: T = 1.33(A); I/B = 60%, O/B = 40% (3% of daily trips, per SanDAG)
PM Peak Hour: T = 5.00(A); I/B = 44%, O/B = 56% (CTCSP "Specialty Retail")

Shopping Center – per 1,000 gross square feet of floor area (ITE Land Use 820)
Daily Trips: T = 42.94 (A)
AM Peak Hour: T = 1.00(A); I/B = 61%, O/B = 39%
PM Peak Hour: T = 9.60(A); I/B = 49%, O/B = 51% (CTCSP "Other Retail")

High-Turnover Sit-Down Restaurant – per 1,000 gross square feet of floor area (ITE Land Use 932)
Daily Trips: T = 127.15 (A)
AM Peak Hour: T = 11.52(A); I/B = 52%, O/B = 48%
PM Peak Hour: T = 10.50(A); I/B = 59%, O/B = 41%

Where: T = Trip Ends; U = Number of Residential Units; A = Building Area in 1,000 square feet
I/B = Inbound Trip Percentage; O/B = Outbound Trip Percentage

Finally, LADOT's current traffic study policies allow for up to a five percent (5%) reduction in a project's residential component trips for the provision of on-site "affordable" units. However, such reductions would be nominal for the revised Project, and therefore, as with the original Project analyses, no "affordable" housing trip reductions were applied to the modified Project. Using these conservative trip generation methodologies and assumptions, the trip generation for the revised Project was calculated, and is summarized in Table IV-31, Revised Project Trip Generation.

Table IV-31
Revised Project Trip Generation

Size/Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Proposed Project							
72 Unit Apartment	479	7	30	37	33	17	50
7,000 sf Specialty Retail	310	5	4	9	15	20	35
(Less 5% Mixed-Use Interaction)	*(16)*	*0*	*0*	*0*	*(1)*	*(1)*	*(2)*
(Less 5% Walk-In Patronage)	*(15)*	*0*	*0*	*0*	*(1)*	*(1)*	*(2)*
(Less 10% Pass-by Trips)	*(28)*	*(1)*	*0*	*(1)*	*(1)*	*(2)*	*(3)*
Subtotal Specialty Retail Trips	251	4	4	8	12	16	28

Table IV-31
Revised Project Trip Generation

Size/Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
6,000 sf "Other" Retail	258	4	2	6	28	30	58
(Less 5% Mixed-Use Interaction)	*(13)*	*0*	*0*	*0*	*(1)*	*(2)*	*(3)*
(Less 5% Walk-In Patronage)	*(12)*	*0*	*0*	*0*	*(1)*	*(2)*	*(3)*
(Less 50% Pass-by Trips)	*(117)*	*(2)*	*(1)*	*(3)*	*(13)*	*(13)*	*(26)*
Subtotal "Other" Retail Trips	116	2	1	3	13	13	26
1,500 sf Restaurant/Café	191	9	8	17	9	7	16
(Less 5% Mixed-Use Interaction)	*(10)*	*(1)*	*0*	*(1)*	*(1)*	*0*	*(1)*
(Less 5% Walk-In Patronage)	*(9)*	*(1)*	*0*	*(1)*	*(1)*	*0*	*(1)*
(Less 20% Pass-by Trips)	*(34)*	*(2)*	*(1)*	*(3)*	*(2)*	*(1)*	*(3)*
Subtotal Restaurant/Cafe Trips	138	5	7	12	5	6	11
Subtotal Proposed Project Trips	**984**	**18**	**42**	**60**	**63**	**52**	**115**
Less Existing Development							
I Unit Single Family Home (vacant)	--	--	--	--	--	--	--
Net Project Trips	**984**	**18**	**42**	**60**	**63**	**52**	**115**
Net Project Site Trips at Adjacent Intersections and Driveways	*1,613*	*23*	*44*	*67*	*79*	*68*	*147*

Source: Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Boulevard Mixed-Use Project, September 30, 2013.

As shown in Table IV-29, once it is completed and fully occupied, the modified Project is expected to generate a total of approximately 984 new trips per day, including 60 total trips (18 inbound, 42 outbound) during the AM peak hour, and 115 total trips (63 inbound, 52 outbound) during the PM peak hour.

However, as also shown in Table IV-29, at the "adjacent intersections" of Vista del Mar/Culver Boulevard and Vista del Mar/Montreal Street, and Vista del Mar and Waterview Street, where per LADOT policy, the assumed pass-by trip reduction factors are not applicable, the revised Project would result in slightly higher trips, with a total of approximately 1,163 new daily trips, including 67 trips (23 inbound, 44 outbound) during the AM peak hour, and 147 trips (79 inbound, 68 outbound) during the PM peak hour.

This level of trip generation for the revised Project is approximately 220 fewer trips per day than the originally-analyzed Project, including decreases of approximately 16 trips (10 inbound, six outbound) during the AM peak hour, and approximately 30 trips (19 inbound, 11 outbound) during the PM peak hour.

Similarly, at the two "adjacent intersections," the revised Project would exhibit approximately 456 fewer daily trips, including approximately 27 fewer trips (15 inbound, 12 outbound) during the AM peak hour, and of approximately 68 trips (39 inbound, 29 outbound) during the PM peak hour. These lower trip generation estimates were then used to evaluate the potential traffic impacts of the modified Project at each of the six study intersections and other analyzed locations, as described below.

Project Trip Distribution

Next, general geographic distribution of the Project trips was identified, based on several factors, including the relative distribution of employment opportunities, shopping and entertainment venues, and locations of other services for the residential component of the Project, and the relative distribution of population from which employees and patrons of the proposed retail, restaurant, and market facilities at the Project Site would be drawn. The resulting general geographic distribution of Project-related trips is summarized below:

- North (Culver Boulevard) – 35%
- South (Vista Del Mar/Pershing Drive) – 40%
- East (Manchester Avenue/Jefferson Boulevard) – 25%
- West (N/A) – 0%

Project Traffic Assignment

The assignment of the anticipated Project trips to the surrounding street and highway system was accomplished in several steps. First, the general geographic directional distribution percentages for the Project's traffic were assigned to specific streets and highways serving the Project area. The next step in the Project traffic assignment process involved the refinement of the general travel patterns to identify the intersection-level turning movements along the key travel routes to and from the Project Site. The final step in the Project traffic assignment process was to calculate the number of net new Project trips traveling through each of the six signalized study intersections.

Project Roadway Improvements

The LAMC requires that all development projects within the City improve the roadways and other transportation facilities adjacent to their respective sites to the rights-of-way and street widths appropriate to each street's designation as noted in the Transportation Element of the City of Los Angeles General Plan, and per LADOT and City of Los Angeles Bureau of Engineering standards. Major Highways such as Vista Del Mar typically provide a total 104-foot right-of-way width, improved with an 80-foot roadway, or a half roadway width (centerline to back of curb) of 40 feet within a 52 foot half right-of-way (centerline to property line). Vista Del Mar adjacent to the Project Site is currently dedicated to a 51.5-foot half right-of-way width, and is improved with an approximately 41.5-foot half street. As such, the existing roadway width of Vista Del Mar exceeds the applicable standards by approximately 1.5 feet, and no roadway

improvements along this Project frontage are warranted. The Project could be required to dedicate an additional one-half foot (six inches) along this Project frontage to provide the full 52-foot half right-of-way, although given the current roadway improvements and provision of a full 10-foot sidewalk, the potential dedication is unnecessary.

Local streets, such as Culver Boulevard and Pacific Avenue adjacent to the Project Site, require a total dedication of 60 feet, improved with a 36 to 40-foot wide roadway, or an 18 to 20-foot wide half roadway within a 30-foot half right-of-way. Culver Boulevard along the north side of the Project Site is currently dedicated to provide a 40-foot half right-of-way, and improved with a 30-foot half-roadway. As the existing right-of-way for Culver Boulevard exceeds its design requirement, no dedications or roadway improvements are required along the Culver Boulevard frontage.

Pacific Avenue, also a Local Street, is currently dedicated to a half right-of-way of approximately 35 feet and improved with a 30-foot wide half roadway along the northern portion of the street between Culver Boulevard and the existing (unused) alley. As such, no additional dedications or roadway widenings are required, although the City typically requires the provision of a 10-foot sidewalk along most local streets. In the event the City would require this condition, the northern portion of Pacific Avenue adjacent to the Project Site could be required to provide an additional 5-foot dedication (to a total of half right-of-way of 40 feet) to construct the appropriate sidewalk. The southern portion of Pacific Avenue between the alley and Vista Del Mar is currently dedicated to a half right-of-way width of approximately 30 feet, and is improved with a half roadway width of approximately 25 feet, and therefore, no additional dedications or widenings are required. However, similar to the northern portion of this roadway, if the City requires the provision of a 10-foot sidewalk, the Project could be required to dedicate an additional 5 feet in order to provide the necessary sidewalk width.

Study Area Traffic Volumes

Existing (Year 2010) Traffic Volumes

Existing (No Project) Conditions

Current traffic volumes for the six signalized study intersection analyzed in the traffic study were obtained from counts performed in late September of 2010. The data represents typical mid-week conditions, during weeks with no holidays or notable special events, and with all area schools, including the nearby Loyola Marymount University campus, in full, normal session.

Existing Plus Revised Project Conditions

LADOT's current traffic study policies require an analysis of potential Project-related impacts on existing conditions, in order to identify any "immediate" traffic impacts within the Project vicinity which may result from development of the Proposed Project alone. The traffic volumes associated with this scenario were developed by adding the net Project traffic volumes to the existing (year 2010) traffic volumes described above.

These "Without Project" and "With Revised Project" traffic volume conditions are the basis for identifying the potential "immediate" incremental impacts of the revised Project at each of the study intersections under the required "existing conditions" analyses.

Future (Year 2015) Traffic Volumes

In addition to the "Existing Plus Project" analyses described above, LADOT also requires an evaluation of the effects of the Proposed Project on the forecast future conditions in the area, with the future study year reflecting the date when the Project is expected to be completed and fully occupied and operational. For purposes of this study, the Project developer has identified that the Project is expected to be operational by the end of the year 2015. This analysis identifies both Project-specific traffic impacts on the future roadway system, as well as the effects of anticipated future traffic growth on area traffic operations, which may be exacerbated by development of the Proposed Project. Future traffic volumes in the Project vicinity, and indeed throughout the region, are anticipated to increase as a result of a number of factors, although two factors contribute most significantly to area traffic growth. The first of these factors is the result of simple ambient increases in the number of vehicles on the roadway system. This ambient traffic growth occurs on both a local and regional basis due to a number of reasons, including but not limited to increases in population (not tied to development), additional vehicles for existing households (as children become driving age, or new multi-vehicle status for current single-vehicle families), economic factors such as new jobs creating new worker trips, and other factors.

The second factor associated with future traffic growth is new traffic resulting from ongoing and continued development. This factor is generally regarded as more localized than the general ambient growth factor described earlier, and is based on information regarding specific development activity within or in close proximity to the Project area. A survey of such development activity in the Project vicinity indicated that there are a number of other projects currently either under construction or planned for development which would likely contribute to future traffic growth within the study area.

Therefore, since the Project is not expected to be built and occupied immediately, its traffic, and consequently, the impacts of that traffic, will occur on a roadway system that is accommodating more traffic than indicated in the discussion of "Existing (2010)" conditions. For this reason, the analysis of future traffic conditions has been expanded to include potential traffic volume increases expected from both ambient growth and from traffic generated by projects that have not yet been developed. These "Future (2015) Without Project" volumes represent the forecast traffic conditions in the study area at the time the Project is expected to be completed, but prior to its occupancy, and form the "baseline" conditions against which the Project's incremental traffic additions to future roadway and intersection operations are assessed.

Without Project Traffic Forecasts

Similar to the "Existing (2010) Without Project" conditions described above, the forecast future (year 2015) "Without Project" volumes for the revised Project traffic impact analysis were also taken directly from the March 2011 Traffic Study. As described in that document, the future study year 2015 traffic volumes, representing forecast area traffic conditions prior to development of either the currently-approved or revised

projects, were estimated through the use of a 1.0 percent ambient traffic growth factor, compounded annually and applied to the existing year 2010 traffic counts, to develop the baseline traffic volume forecasts for the year 2015.

However, in addition to the assumed 1.0 percent annual ambient traffic growth factor, the forecasts of future (year 2015) traffic volumes utilized in the March 2011 Traffic Study also included traffic generated by 26 "related projects" (ongoing or proposed other development within the study area that could potentially affect future traffic conditions in the Project vicinity). The locations and descriptions of these related projects, and their effects on future traffic volumes, are discussed in detail in the March 2011 Traffic Study, and are incorporated without change into this revised analysis by reference.

Therefore, the "Future (2015) Without Project" traffic volumes used in this supplemental analysis are identical to those from the approved Revised March 2011 traffic study, in order to provide a standard basis for the comparison of the potential traffic impacts of the originally-approved and revised Projects.

With Modified Project Traffic

Finally, the forecast future year 2015 "With Modified Project" traffic conditions in the study area, representing the anticipated traffic volumes at the study intersections following the completion and full occupancy of the revised Project, were identified. These conditions were developed by adding the incremental net revised Project traffic during both the AM and PM peak hours, to the baseline "Future (2015) Without Project" AM and PM peak hour traffic volumes.

Ambient Traffic Growth

Based on analyses of the trends in traffic growth in the study area over the last several years, LADOT determined that an annual traffic growth factor of 1.0 percent is reasonable. In fact, as identified in the current (2004) Los Angeles County Congestion Management Program ("CMP"), actual anticipated growth in the "Westside" area encompassing the study area, is forecast to be approximately 0.80 to 0.85 percent annually, inclusive of both ambient growth and traffic from cumulative area development. As such, the assumed 1.0 percent annual growth factor is expected to be quite conservative.

This ambient traffic growth factor is used to account for expected increases in traffic resulting from general ambient traffic growth in the study vicinity due to ongoing regional population growth, or from potential development projects not yet proposed or outside of the study area. The ambient growth factor, compounded annually, was applied to the 2010 traffic volumes to develop estimates of the future traffic volumes for the future year 2015 baseline conditions.

Related Projects

In addition to the 1.0 percent annual traffic growth rate used for the traffic study, a listing of specific projects located within the study area – an approximately 1.5-mile radius from the Project Site – were obtained both from LADOT (for projects located within the City of Los Angeles) and from the Los Angeles County

Department of Regional Planning (for projects within Marina del Rey). A field survey of the study area was also conducted to identify any other potential developments not on these lists. As noted previously, the 1.0 percent annual ambient traffic growth factor is expected to adequately represent all area traffic growth within the study period, and as such, the inclusion of traffic due to specific projects in the study area in addition to the assumed ambient background traffic growth may tend to overstate cumulative conditions. Therefore, so as not to inordinately deteriorate future traffic conditions and to more accurately predict future traffic volumes, projects generating fewer than 20 net peak hour trips, along with developments located outside the 1.5-mile study radius, were assumed to be included within the 1.0 percent annual ambient traffic growth increases, and were not included as specific traffic generators.

Using these assumptions as guidelines, a review of the LADOT projects lists, plus the field survey information, indicated that a total of 26 individual projects near the Project Site might produce additional traffic at study intersections. Potential traffic from these prospective area developments was added to the 1.0 percent annual ambient traffic growth to produce the estimates of the future 2015 study year traffic volumes. The 26 identified related projects assumed in this analysis are individually listed and described in Table IV-32.

The "Future (2015) Without Project" condition traffic volumes for the analysis were developed by combining the assumed ambient traffic growth in the area with new traffic generated by the potential cumulative development in the vicinity of the Project Site. As described earlier, these values represent the anticipated traffic volumes in the Project vicinity prior to the development of the Proposed Project, and form the "benchmark" values for determining and evaluating the Project's potential traffic impacts on the area street system.

Finally, the net Project traffic volumes were combined with the forecast future "Without Project" benchmark volumes to produce the anticipated "Future (2015) With Project" traffic volume estimates, which are shown in Appendix G. These future year (2015) "Without Project" and "With Project" traffic volume forecasts were used as the basis for determining the incremental traffic impacts attributable to the development of the Proposed Project at the expected time of its completion and occupancy.

Table IV-32
Related Projects Descriptions

No.	Land Use/Description	Size/Units	Address
1	Specialty Retail *Warehouse (removed)*	10,000 sf *10,000 sf*	585 Venice Boulevard
2	Hotel Restaurant (High-turnover)	30 rooms 2,000 sf	305 Ocean Front Walk
3	Residential Retail	5 units 5,700 sf	580 Venice Boulevard
4	Supermarket	36,800 sf	1600 Lincoln Boulevard
5	Bank (Walk-in)	2,800 sf	12410 Venice Boulevard

Table IV-32
Related Projects Descriptions

No.	Land Use/Description	Size/Units	Address
	Specialty Retail (removed)	*2,800 sf*	
6	Office Specialty Retail	41,000 sf 9,500 sf	11955 W. Washington Boulevard
7	LADPW Maintenance Yard Expansion		3233 Thatcher Avenue
8	Loyola Marymount University (student increase)	2,540 students	1 LMU Drive
9	Apartment	126 units	7280-7298 W. Manchester Avenue
10	Hotel Public Park	288 rooms 1 acre	NEC Tahiti Way/Via Marina
11	Apartment Boat Dock *Apartment (removed)* *Boat Dock (removed)*	526 units 168 slips *136 units* *184 slips*	E/S Via Marina near Marquesas Way
12	Apartment *Apartment (removed)*	544 units *202 units*	SWC Via Marina/Panay Way
13	Retail Coffee Shop Restaurant *Office (removed)* *Restaurant (removed)* *Furniture Showroom (removed)*	15,296 sf 1,797 sf 5,713 sf *9,180 sf* *5,713 sf* *7,500 sf*	S/S Washington Boulevard between Via Marina and Via Dolce
14	Senior Care Specialty Retail	114 units 3,000 sf	E/O Palawan Way between Washington Boulevard and Admiralty Way
15	Apartment Retail Restaurant *Restaurant (removed)* *Public Parking Lot (removed)*	351 units 24,300 sf 266 seats *1,067 seats* *191 spaces*	SEC Admiralty Way/Palawan Way
16	Commercial Marina Dry Storage	91,090 sf 148 slips 234 slips	W/O Admiralty Way between Bali Way and Mindanao Way (Parcel 44)
17	Storage *County Office (removed)* *Public Parking Lot (removed)*	375 boats *2,000 sf* *236 spaces*	Fiji Way, W/O Admiralty Way (Parcels 52, GG)
18	Retail Restaurant	8,400 sf 17,546 sf	Near southern terminus of Fiji Way (Parcels 55, 56 W)

Table IV-32
Related Projects Descriptions

No.	Land Use/Description	Size/Units	Address
	Commercial Hotel *Retail (removed)* *Office (removed)* *Restaurants (removed)* *Boat Slips (removed)*	2,500 sf 132 rooms *2,580 sf* *10,404 sf* *16,149 sf* *17 slips*	
19	Office	7,994 sf	309-315 E. Culver Boulevard
20	School (Private K-8) Expansion	25 students	5401 S. Beethoven Street
21	Office Apartment Retail Community Serving Uses	175,000 sf 2,600 sf 150,000 sf 40,000 sf	S/O Jefferson Boulevard/ Westlawn Avenue
22	Office Condominium Retail Production and Stage Support Community Service Uses	1,922,050 sf 3,246 sf 25,000 sf 1,129,900 sf 65,000 sf	S/O Jefferson Boulevard, E/O Lincoln Boulevard (assumed 30% completed and occupied)
23	Condominium Shopping Center *Shopping Center (removed)*	244 units 9,000 sf *21,038 sf*	E/O Lincoln Boulevard between SR-90 and Maxella Avenue
24	Office Retail	31,150 sf 6,260 sf	12803 Washington Boulevard
25	Single-Family Residential Retail	29 units 4,000 sf	6819 Pacific Avenue
26	Apartment Pharmacy/Drugstore *Restaurant (removed)*	63 units 11,000 sf *4,000 sf*	220 Culver Boulevard

Sf = square feet
Source: Hirsch/Green Transportation, 138 Culver Boulevard Mixed-Use Project, March 2011.

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

Potentially Significant Unless Mitigated. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Operational Impacts

Analysis Methodology and Results

Based on LADOT's current traffic study policies, this study uses the Critical Movement Analysis ("CMA") methodology for the analysis and evaluation of traffic operations at signalized intersections under their jurisdiction, as detailed in Circular Number 212 published by the Transportation Research Board ("TRB"). This analysis technique describes the operating characteristics of an intersection in terms of the "Level of Service," based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection ("Capacity") and the quality of that traffic flow ("Level of Service").

"Capacity" represents the maximum total hourly volume of vehicles in the critical lanes which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movement or groups of movements which exhibit the highest "per lane" volumes, thus defining the maximum amount of vehicles attempting to negotiate through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more "lost" or "start up" time, as vehicles exhibit slight driver reaction delays when signal indications change from "red" to "green." Additional signal phases introduce more signal indication changes, creating more opportunities for lost time during the signal cycle, and reducing the efficiency and thus the capacity of an intersection.

For the CMA methodology, the intersection capacities for various levels of service are based on the number of traffic signal phases, as shown in Table IV-29. For the intersection evaluation and transportation planning purposes of this traffic study, LADOT policy requires that the maximum "baseline" capacity of an intersection (without ATSAC/ATCS traffic signal coordination upgrades, as described later in this section) equates to the value of Level of Service ("LOS") E shown in Table IV-33. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

Table IV-33
Critical Movement Analysis Volume Ranges per Level of Service

Level of Service	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	Four or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	Not Applicable		

For planning applications only. Not appropriate for operations/design applications.

Source: Hirsch/Green Transportation, 138 Culver Boulevard Mixed-Use Project, March 2011.

The "Critical Movement" indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This total traffic volume value, which represents the most critical intersection demand, is then divided by the appropriate intersection capacity value (from Table IV-29) for the type of signal control at the intersection, to determine the "CMA value" for the intersection, which is roughly equivalent to its volume-to-capacity ratio.

"Level of Service" ("LOS") describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designed, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown in Table IV-34.

Table IV-34
Level of Service as a Function of CMA Value or Average Vehicle Delay

CMA Value	Ave. Vehicle Delay (sec.)	Level of Service	Intersection Operation/Traffic Flow Characteristics
≤ 0.600	≤ 10	A	No congestion; all vehicles clear in a single cycle.
> 6.00 ≤ 0.700	>10 – 20	B	Minimal congestion; all vehicles still clear in a single cycle.
> 0.700 ≤ 0.800	>20 – 35	C	No major congestion; most vehicles clear in a single cycle.
> 0.800 ≤ 0.900	>35 – 55	D	Generally uncongested, but vehicles may wait through more than one cycle; no short duration queues form on critical approaches.
> 0.900 ≤ 1.000	>55 – 80	E	Increased congestion on critical approaches; long duration queues form at higher end of range.
> 1.000	>80	F	Over capacity; forced flow with long periods of congestion; substantial queues form.

Source: Hirsch/Green Transportation, 138 Culver Boulevard Mixed-Use Project, March 2011.

Using the procedures described above, the "basic" CMA value and corresponding LOS for each of the six study intersections were calculated for the required traffic scenarios described earlier; "Existing (2010)," "Existing (2010) Plus Project," "Future (2015) Without Project," and "Future (2015) With Project." These "basic" calculations were adjusted, however, to account for the operational improvements resulting from the ATSAC/ATCS traffic signal coordination enhancements described earlier, which are not considered in the basic CMA analysis methodology. LADOT has determined that intersections connected to the ATSAC/ATCS signal coordination system experience an approximate ten percent increase in capacity as compared to non-ATSAC/ATCS locations; per LADOT policy, the basic CMA value calculated using the standard methodology was reduced by 0.100 for locations improved with ATSAC/ATCS, in order to estimate the effectiveness of the resulting increases in intersection capacity.

Revised Project Traffic Impact Analysis

The existing (2010) and forecast (year 2015) "Without Project" and "With Modified Project" traffic conditions were then analyzed using the same Critical Movement Analysis ("CMA") procedures and methodologies described in the March 2011 Traffic Study. As such, it is of note that the "Existing (No Project)" and "Future Without Project" conditions identified in this supplemental study are identical to those from that earlier study, since as described earlier, the traffic volumes for those two scenarios are identical to those used in the March 2011 analyses. The results of the supplemental analyses for both the "existing" and forecast "future" without and with the modified Project conditions, as well as the identification of the potential incremental traffic impacts associated with the revised Project, are summarized in Table IV-35(a) and IV-35(b).

Table IV-35(a)
Critical Movement Analysis Summary Existing (2010) Without and With Revised Project Conditions

No.	Intersection	Peak Hour	Existing (No Project)		Existing Plus Revised Project		
			CMA	LOS	CMA	LOS	Impact
1	Vista Del Mar/Culver Boulevard &	AM	0.667	B	0.679	B	0.012
	Vista Del Mar/Montreal Street	PM	0.681	B	0.699	B	0.018
2	Culver Boulevard &	AM	1.316	F	1.323	F	0.007
	Nicholson Street	PM	0.760	C	0.778	C	0.018
3	Culver Boulevard &	AM	0.712	C	0.717	C	0.005
	Jefferson Boulevard	PM	0.787	C	0.799	C	0.012
4	Pershing Drive &	AM	0.163	A	0.164	A	0.001
	Pershing Drive/Cabora Drive	PM	0.553	A	0.555	A	0.002
5	Manchester Avenue &	AM	0.456	A	0.459	A	0.003
	Pershing Drive	PM	0.459	A	0.465	A	0.006
6	Vista Del Mar &	AM	0.331	A	0.3340.283	A	0.003
	Waterview Street	PM	0.277	A		A	0.006

Source: Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Boulevard Mixed-Use Project, September 30, 2013.

Table IV-35(b)
Critical Movement Analysis Summary Future (2015) Without and With Revised Project Conditions

No.	Intersection	Peak Hour	Without Project		With Revised Project		
			CMA	LOS	CMA	LOS	Impact
1	Vista Del Mar/Culver Boulevard &	AM	0.736	C	0.748	C	0.012
	Vista Del Mar/Montreal Street	PM	0.764	C	0.783	C	0.019
2	Culver Boulevard &	AM	1.428	F	1.435	F	0.007
	Nicholson Street	PM	0.852	D	0.871	D	0.019
3	Culver Boulevard &	AM	0.775	C	0.781	C	0.006
	Jefferson Boulevard	PM	0.877	D	0.890	D	0.013
4	Pershing Drive &	AM	0.189	A	0.190	A	0.001
	Pershing Drive/Cabora Drive	PM	0.604	B	0.606	B	0.002
5	Manchester Avenue &	AM	0.497	A	0.500	A	0.003
	Pershing Drive	PM	0.510	A	0.517	A	0.007
6	Vista Del Mar &	AM	0.365	A	0.367	A	0.002
	Waterview Street	PM	0.311	A	0.317	A	0.006

Source: Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Boulevard Mixed-Use Project, September 30, 2013.

Existing (2010) Conditions

As shown in Table IV-35(a), and previously described in the approved March 2011 Traffic Study, all of the study intersections are currently operating at acceptable levels of service for urban conditions (LOS A through D) during both the AM and PM peak commute periods, with the exception of Culver Boulevard and Nicholson Street, which exhibits undesirable LOS F conditions during the AM peak hour, primarily due to high traffic volumes along the northbound (Nicholson Street) and eastbound (Culver Boulevard) approaches during this period.

It is of note that the levels of service shown in Table IV-35(a) represent the highest traffic volumes and levels of congestion for the subject intersections, which occurs during typical weekday morning and evening commuter traffic periods (generally 7:00 AM to 10:00 AM and 3:00 PM to 6:00 PM). The operations of the study intersections, as well as at other locations throughout the study area, generally improve during the off-peak hours, due to reductions in traffic volumes. As with the originally-proposed Project, the additional traffic generated by the revised Project would also result in incremental increases in the CMA values at each of the study intersections, with the magnitudes of these increases varying depending on several factors, including the intersection's proximity to the Project Site, its location along the anticipated Project traffic travel routes, or the specific geometries and/or operating characteristics of the intersection. However, as also shown in Table IV-35(a), and similar to the original Project analyzed in the March 2011 Traffic Study, the revised Project is not expected to result in the deterioration of the current operating conditions (LOS) at either of the study locations during either the AM or PM peak hours.

Future (2015) Conditions

As further indicated in Table IV-35(b), anticipated ambient traffic growth and traffic increases from other ongoing or proposed developments in and around the study area, unrelated to the development of the revised Project, could result in a deterioration of operations at several of the study intersections from the existing conditions by the year 2015, as summarized below.

- Vista Del Mar and Culver Boulevard – LOS B to LOS C (AM/PM)
- Culver Boulevard and Nicholson Street – LOS C to LOS D (PM)
- Culver Boulevard and Jefferson Boulevard – LOS C to LOS D (PM)
- Pershing Drive and Pershing Drive/Cabora Drive – LOS A to LOS B (PM)

Nonetheless, despite these anticipated changes in operational conditions, each of the six study intersections are forecast to continue to exhibit acceptable levels of service (LOS D or better) during both peak hours, again with the exception of Culver Boulevard and Nicholson Street, which will continue to operate at LOS F conditions during the AM peak hour, prior to the development of the revised Project.

Table IV-33(b) also shows that, again similar to the results of the analysis of the "Future With Project"

scenario contained in the March 2011 Traffic Study, traffic generated by the revised Project is expected to result in incremental increases in the forecast future year 2015 CMA values at each of the six study intersections, although no further deterioration of the intersection LOS values are expected during either the AM or PM peak hours beyond that already anticipated as a result of cumulative traffic growth (ambient growth plus related projects' traffic) in the study area.

Further, when reviewing the forecast future (year 2015) "Without Project" conditions shown in Table IV-35(a) and (b), however, it is important to recall that the anticipated traffic volume increases and forecast deterioration in levels of service are considered to be a "worst case" projection of future conditions for several reasons. First, not all of the 26 "related projects" identified in the traffic study are expected to be built, or may be built to a lesser level than currently proposed. Additionally, the traffic generated by these potential developments was not assumed to exhibit any trip linkages with other existing or new development (similar to the "internal interaction" factor described earlier in relation to the project itself, but on a much wider scale), which could reduce overall traffic volumes in the Project vicinity. Finally, some or all of the potential related projects may be required to implement trip-reduction programs or construct roadway and/or traffic signal improvements in the study area that could further reduce the forecast future traffic volumes, or provide additional traffic capacity which could improve the operations of some of the study intersections compared to the conditions shown in Table IV-35(a) and (b).

Once developed, traffic generated by the Proposed Project would add to the future cumulative traffic increases expected in the Project vicinity, which could have an effect on the operations of the study intersections. Similar to the situation described earlier in the discussion of the Project's potential impacts to the "existing" (year 2010) conditions, the Proposed Project would result in incremental increases in the forecast future (year 2015) CMA values at each of the six study intersections. However, a comparison of the future "Without Project" and "With Project" values shown in Table IV-35(a) and (b) indicates that, unlike for the existing year 2010 conditions, the anticipated Project traffic additions to the study area roadway system would not result in any further deterioration in the level of service beyond that expected as a result of forecast cumulative traffic growth (ambient growth plus related projects' traffic), and each of the six signalized study intersections will continue to exhibit acceptable LOS D or better conditions during both peak hours, again with the exception of Culver Boulevard and Nicholson Street, which is forecast to continue operating at LOS F during the AM peak hour.

Intersection Impact Significance Criteria

However, the potential changes to intersection levels of service described earlier for both the "Existing Plus Project" and "Future With Project" scenarios are not the sole standard for evaluating the "significance" of a Project's incremental impacts. LADOT defines a significant traffic impact attributable to a Project based on a "stepped scale," with intersections at high volume-to-capacity ratios being more sensitive to additional traffic than those operating with available surplus capacity.

A significant impact is identified as an increase in the CMA value, due to Project-related traffic, of 0.010 or more when the final ("With Project") intersection Level of Service is LOS E or F, a CMA increase of

0.020 or more when the final Level of Service is LOS D, or an increase of 0.040 or more at LOS C. No significant impacts are deemed to occur at LOS A or LOS B, as summarized in Table IV-36, as these operating conditions exhibit sufficient surplus capacities to accommodate traffic increases with little effect on traffic delays.

Table IV-36
City of Los Angeles Significant Traffic Impact Criteria

LOS	Final (With Project) CMA Value	Project-Related Increase in CMA Value
A or B	≤ 0.700	No Impacts
C	$> 0.700 \leq 0.800$	≥ 0.040
D	$> 0.800 \leq 0.900$	≥ 0.020
E or F	> 0.900	≥ 0.010

Source: Hirsch/Green Transportation, 138 Culver Boulevard Mixed-Use Project, March 2011.

Using the impact evaluation criteria shown in Table IV-34, the revised Project's incremental traffic impacts summarized in Table IV-35(a) and (b) are not considered to be "significant" at any of the six study intersections under either the "existing" year 2010 or forecast future year 2015 conditions, unlike the results shown in the March 2011 Traffic Study, which identified a significant impact to the intersection of Culver Boulevard and Nicholson Street, although that impact occurred only during the PM peak hour under the forecast future 2015 traffic conditions scenario.

LADOT has determined that the proposed project will not have significant traffic impacts on the studied intersections and neighborhood street segments. Compliance with the Mitigation Measures in this Section are expected to reduce the potential impacts of the proposed project.

Modified Project Local/Residential Street Traffic Impact Analysis

In addition to the intersection impacts summarized above, an examination of the location of the Proposed Project and a review of the general traffic circulation patterns within the study area indicates that some of the Project traffic would utilize the local/residential street segment of Pershing Drive to travel between Culver Boulevard and the segment of Pershing Drive (south of the Pershing Drive/Cabora Drive split) on their way to and from the Project Site. Additionally, it is anticipated that the proposed commercial components of the development will attract local patronage, and that some of the Project's traffic would actually be generated within this nearby residential area. While such locally-generated trips would not necessarily produce additional traffic on area roadways – such trips are likely already occurring to other more distant facilities, and would simply redirect to the Project – for purposes of this study, these locally-originating trips were viewed as new trips to and from the Proposed Project, resulting in increased traffic on some of the local access streets, including Pershing Drive. Therefore, an additional analysis was conducted to determine the potential for Project impacts on the local/residential portion of Pershing Drive (between Culver Boulevard and Pershing Drive/Nicholson Street).

Local/residential street traffic impacts, unlike the intersection analyses discussed above, are based on daily traffic volumes rather than peak hour volumes. Within the City of Los Angeles, project traffic impacts on local streets are evaluated based on the project's percentage increase to the street's existing or forecast average daily traffic ("ADT") volumes. The general guidelines and local/residential roadway impact criteria are identified in LADOT's "Traffic Impact Analysis Policies and Procedures (December 2010)." However, as noted earlier, the Project Site lies within the jurisdiction of the CTCSP, which provides local/residential street impact criteria that supersede LADOT's impact threshold criteria for projects within the Specific Plan boundaries, although the CTCSP criteria identify impact criteria for local/residential facilities carrying 1,000 or more vehicles per day. Therefore, in order to provide a comprehensive evaluation of potential Project impacts in the study area, the LADOT impact criteria for local/residential roadways was used to supplement the CTCSP impact thresholds for roadways exhibiting fewer than 1,000 vehicles per day. The local/residential street impact criteria uses in this analysis are summarized in Table IV-37 below.

Table IV-37
Local/Residential Street Significant Impact Criteria [a]

Projected Future ADT (With Project)	Project-Related Increase in Future ADT
Less than 1,000	16 percent or more [b]
1,000 or more	12.5 percent or more

[a] *Per LADOT Traffic Study Policies and Procedures, Revised March 2002.*
[b] *Per CTCSP Ordinance No. 168,999, September 22, 1993.*
Source: Hirsch/Green Transportation, 138 Culver Mixed-Use Project, March 2011.

New 24-hour traffic counts for the local/residential street segment of Pershing Drive were collected at a point just south of Culver Boulevard in September of 2010, at the same time as the previously described study intersection counts, in order to establish the existing (year 2010) conditions. Net daily Project traffic volumes were added to these baseline volumes to create the "Existing (2010) Plus Project" conditions, in order to identify the potential "immediate" traffic impacts of the Project on this roadway, per LADOT requirements. The future (year 2015) "Without Project" traffic volume forecasts for this portion of Pershing Drive were estimated using the same procedures and assumptions described previously for the development of the future year intersection volumes, including the application of the 1.0 percent annual "ambient" traffic growth factor, and the addition of traffic generated by the 26 related projects. Finally, the net daily Project traffic volumes were then added to the future "Without Project" conditions to form the future year 2015 forecast "With Project" traffic estimates. The existing and future forecast traffic estimates for the selected local/residential street segments are summarized in Table IV-38.

Table IV-38
Local/Residential Street Traffic Impact Analysis Summary
Existing (2010) and Future (2015) Average Daily Traffic Volumes

	Existing (2010)	Future (2015)

Street Segment	Existing	Project Traffic	With Project	Percent Increase	Without Project	With Project	Percent Increase
Pershing Drive, s/o Culver Boulevard	1,742	148	18,90	8.5%	2,068	2,216	7.2%

Note: Project traffic conditions are the same for both "Existing" and "Future" conditions.
Source: Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Mixed-Use Project, September 30,2013.

As discussed in detail in the March 2011 Traffic Study, approximately five percent (5%) of the Project's "inbound" trips, and approximately one-quarter (25%) of the project's "outbound" trips are anticipated to utilize the subject segment of Pershing Drive as part of their typical travel route.

Based on these travel pattern assumptions in concert with the Project's "daily" trip generation values for both the residential and commercial/retail components shown previously, the modified Project is expected to add a total of approximately 148 net new trips per day to the study segment of Pershing Drive (5% of 492 daily inbound trips = 25 trips, plus 25% of 492 daily outbound trips = 123 trips), or approximately 33 fewer trips per day than were anticipated for the original Project.

Using the same existing (2010) and forecast future (2015) "without project" volumes for Pershing Drive as from the March 2011 Traffic Study, the revised Project would result in an "Existing Plus Revised Project" total daily traffic volume on this segment of the roadway of approximately 1,890 vehicles per day once it is completed and occupied.

As shown in Table IV-38, these Project traffic additions equate to an incremental increase (over the existing volumes) of about 8.5 percent, well below the applicable CTCSP "significance" threshold of 12.5 percent (for roadways accommodating 1,000 or more vehicles per day), and as such, the modified Project would create no "immediate" significant impacts to this portion of Pershing Drive. Similarly, the addition of the net new traffic generated by the revised Project to this local/residential street segment would result in a "Future (2015) With Revised Project" total daily traffic volume of approximately 2,216 vehicles per day, and a Project-related incremental impact of approximately 7.2 percent, again substantially less than the applicable 12.5 percent "significance" threshold.

City Department of Transportation Assessment [78]

Pursuant to the Coastal Transportation Corridor Specific Plan (CTCSP) Ordinance No. 168,999, the Department of Transportation (DOT) issued a traffic assessment on September 22, 2011 for the proposed mixed-use residential and commercial Project located at 138 East Culver Boulevard in the Playa del Rey area. On September 30, 2013, DOT received a supplemental traffic impact analysis, prepared by

[78] *City of Los Angeles, Memorandum from Department of Transportation to Department of City Planning, November 15, 2013 (Appendix G.3 to this IS/MND).*

Hirsch/Green Transportation Consulting, Inc., that analyzed changes due to reduction in the Project size and other modifications. After a careful review of the pertinent data, DOT has determined that the traffic study adequately describes the Project-related traffic impacts of the proposed development.

Discussion and Findings

The Revised Project is estimated to generate 984 net new daily trips, 60 net new trips in the A.M. peak hour, and 115 net new trips in the P.M. peak hour.

The originally-analyzed Project resulted in a significant impact at Culver Boulevard and Nicholson Street intersection. However, DOT has determined that the Revised Project would not have significant traffic impacts at any of the studied intersections.

In addition, DOT has determined that the Revised Project would not have significant traffic impacts at any of the neighborhood street segments analyzed.

Project Requirements

DOT recommends that the following Project requirements be adopted as conditions of approval for the proposed Project. In addition, these requirements must be completed and/or guaranteed before the issuance of any building permits for the proposed Project.

Mitigation Measures

XVI-10. Increased Vehicle Trips/Congestion. Implementing measures detailed in said Department's communication to the Planning Department dated November 15, 2013 and attached shall be complied with. Such report and mitigation measures are incorporated herein by reference:

- **Application Fee.** Pursuant to Section 5.C of the CTCSP, the applicant submitted a payment of $6,124.55 for the application/traffic study review fee on July 18, 2011.
- **Covenant and Agreement.** Pursuant to Section 5.B of the CTCSP, the owner(s) of the property must sign and record a Covenant and Agreement prior to issuance of any building permit, acknowledging the contents and limitations of this Specific Plan in a form designed to run with the land.
- **Highway Dedication and Physical Street Improvements.** Pursuant to Section 5.D.2 of the CTCSP, and in order to mitigate potential access and circulation impacts, the applicant may be required to make highway dedications and improvements to comply with the following street standards:
    - Vista Del Mar is designated as a Scenic Major Highway, Class II in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross section for this road classification is a 40-foot half roadway within a 52-foot half right-of-way. The Project will be required to provide a variable-width dedication to complete a 52-foot half right-of-way along the entire Vista Del Mar frontage of the Project

site, and street improvements must be provided in order to complete a 40-ft half roadway width along with a 12-foot wide concrete sidewalk within the new right-of-way limit along this frontage.

- Culver Boulevard is designated as a Local Street (in a commercial and multiple residential area) in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross section for a Local Street is a 20-ft half roadway within a 30-foot half right-of-way. This segment of Culver Boulevard currently consists of a 30-foot half roadway within a 40-foot half right-of-way. The Project is requesting a 10-foot wide right-of-way vacation along Culver Boulevard. Since this segment of Culver Boulevard segment will conform to the Local Street Standards even with the requested merger area, DOT has no objection to the requested street vacation. However, the Project will be required to reconstruct the half roadway of Culver Boulevard adjacent to the Project site to the standard 20-foot width, and construct a new 10-foot wide concrete sidewalk within the new right-of-way limit along this frontage.
- Trolley Place (aka, Pacific Avenue) is designated as a Local Street (in a commercial and multiple residential area) in the Streets and Highways Element of the City's General Plan. Standard Plan S-470-0 dictates that the standard cross section for a Local Street is a 20-foot half roadway within a 35-foot half right-of-way. The Project is requesting a 5-foot wide right-of-way vacation along Trolley Place. Since Trolley Place will conform to the Local Street Standards even with the requested merger area, DOT has no objection to the requested street vacation. However, the project will be required to reconstruct the half roadway adjacent to the Project Site to the standard 20-foot width and construct a new 10-foot wide concrete sidewalk within the new right-of-way limit along this frontage.

The applicant shall further consult with the Bureau of Engineering for any other highway dedication or street widening requirements. These requirements must be guaranteed before issuance of any building permit through the B-permit process of the Bureau of Engineering, Department of Public Works. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and the Bureau of Engineering.

- **Construction Impacts.** DOT recommends that a construction worksite traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.
- **Site Access and Internal Circulation.** This determination does not include approval of the project's driveways, internal circulation and parking scheme. Adverse traffic impacts could occur due to access and circulation issues. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site/driveway plans, at a scale of at least 1" = 40', separately to DOT's WLA/Coastal Development Review Section at 7166 West Manchester Avenue, Los Angeles

90045 as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur if the adopted California Department of Transportation (Caltrans) and Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management program (CMP)[79] was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

The CMP project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the Project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where the Project could add 150 or more trips in either direction during the peak hours must be analyzed.

CMP Monitoring Intersection Impacts

The CMP identifies five arterial monitoring intersections within the general study area (approximately 3.0-mile radius from the Project Site. These CMP arterial monitoring intersections are listed below:

- Lincoln Boulevard and Venice Boulevard
- Lincoln Boulevard and Marina Expressway (SR-90)
- Lincoln Boulevard and Manchester Avenue
- Sepulveda Boulevard and Manchester Avenue
- Lincoln Boulevard and Sepulveda Boulevard

All of these CMP monitoring intersection locations are within the City of Los Angeles, but are outside the immediate study area, and are expected to be beyond the range of identifiable Project traffic impacts, as discussed below.

The CMP requires that detailed analyses be conducted for any of these locations where the Proposed Project is anticipated to add 50 or more total trips during either the AM or PM peak hours. A review of the net

[79] *2010 Congestion Management Program, Los Angeles County Metropolitan Transportation Authority, 2010.*

Project traffic additions to the study area indicates that the net new Project traffic through most of the "boundary" intersections examined in the Project traffic study (e.g., those locations representing the outermost study intersections) are well below the 50 trip threshold at all of the study intersections during the AM peak hour, with a maximum of approximately 27 trips (total of both directions along Culver Boulevard, east of its intersection with Jefferson Boulevard) traveling outside the immediate study area along any of the available travel routes. Net Project trip additions to all other Project access routes would be less than this amount (27 trips). During the PM peak hour, total net Project traffic traveling to and from the north and east of the Project Site along Culver Boulevard (east of Jefferson Boulevard), is estimated to be approximately 51 trips, while at the intersection of Vista Del Mar and Waterview Street, the Project is expected to add approximately 54 net new trips. Total net Project traffic additions during the PM peak hour along Jefferson Boulevard (east of Culver Boulevard), Manchester Avenue (east of Pershing Drive), and Pershing Drive (south of Manchester Avenue) would each be less than 25 vehicles.

Therefore, net Project traffic additions to only Culver Boulevard and Vista Del Mar outside the study area could potentially exceed the CMP's 50 trip threshold, although only by one trip and four trips, respectively. Additionally, it is expected that Project traffic would disperse throughout the area roadway network outside the study area, and total Project volume additions to any of the five pertinent CMP arterial intersections would be reduced from these near-threshold values. It is estimated that no more than 20 percent of the Project's trips, or a maximum total of approximately 30 net trips (during the PM peak hour), would travel through any of the identified CMP arterial monitoring intersections. This level of incremental Project traffic additions would not result in significant impacts at any of the CMP locations. This conclusion is also supported by the fact that the Project does not significantly impact any of the "boundary" intersections where Project traffic is expected to be higher (the only potentially significant impact occurs at Culver Boulevard and Nicholson Street, near the Project Site). Therefore, no significant Project-related impacts would occur at the more distant CMP arterial monitoring intersections.

Since the revised Project is expected to result in reduced trip generation levels from that evaluated for the original Project (and since all Project-related trip distributions and assignments remain unchanged from those in the approved in the March 2011 Traffic Study), it can reasonably be concluded that the revised Project would not result in any significant impacts to any of the CMP facilities.

CMP Freeway Segment Impacts

An examination was also made of the potential for Project-related freeway impacts within the Project study area. As identified under Response to Checklist Question 16(a), above, the Project would generate substantially fewer than 150 net new directional vehicles per hour during both the AM and PM peak hours, with a maximum of 82 net inbound and 63 net outbound trips during the PM peak hour. Directional trips during the AM peak hour are lower, at 28 net inbound and 48 net outbound trips. Additionally, only a portion of the Project's trips are expected to use the nearby San Diego or Marina Freeways as travel routes, and as a result, directional peak hour Project trip additions to either of these facilities would be expected to be a maximum of fewer than 15 vehicles during any peak hour, well below the 150 trip threshold requiring

any detailed analyses. These nominal Project-related freeway traffic additions would not produce any measurable effects on any of the regional transportation facilities.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions. The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact resulting from hazardous design features would occur.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

Site Access

Original Project

Access to the Project's primary resident, guest, and patron parking facility would be provided via a single two-way driveway along Pacific Avenue, on the western side of the Site, located approximately 80 feet northwest of the intersection of Pacific Avenue and Vista Del Mar. A separate on-site delivery entrance and loading area would also be provided along Pacific Avenue, approximately 10 feet northwest of the primary driveway. Due to the Project's driveway location along Pacific Avenue, a relatively light trafficked street, there are no foreseeable issues with access operations at the Site, and as such, the driveway is expected to provide "full service" (left- and right-turn) entry and exit capability. However, to assure that safe operations and adequate capacity are provided to accommodate the vehicular access demands of the Project itself, the operations of the Project's driveways were also examined. The total traffic volumes at the Project's driveway were determined using the Project traffic assignment percentages, along with the Project trip

generation estimates, provided above, although the Project's driveway access volumes are slightly higher than the net Project trips identified previously.

As with the Project trip calculations at the Site-adjacent intersections, the pass-by trip reductions for the Project's "retail" component traffic are not considered in the calculation of the Project's driveway volumes. Pass-by trips, while not necessarily new Project trips on the streets and intersections in the general area, would actually access the Project Site and are therefore part of the Project's overall driveway activity. The previously discussed retail "internal interaction" and "walk in patronage" trip discounts remain applicable in the calculation of driveway trips, since these factors are intrinsic to the Site's traffic generation, and actually remove trips from both the area roadway network as well as from the Project's driveway access locations.

Therefore, the Project's total driveway volumes, representing the actual number of vehicles expected to enter and exit the Project's driveways during the typical weekday peak hour periods, including trips generated by both the proposed residential and commercial components, would be approximately 1,619 vehicles per day, including 94 trips (38 inbound, 56 outbound) during the AM peak hour, and 215 trips (118 inbound, 97 outbound) during the PM peak hour. These driveway volumes are identical to the "no pass-by" adjacent intersection trip estimates identified previously.

The Project site plans do not indicate any type of access control at the driveway entrance from Pacific Avenue, such as control arms activated by card keys or ticket dispensers, and as such, the driveway would exhibit "uncontrolled" entering and existing capabilities. Typically, uncontrolled driveways provide entry capacities of between 750 to 1,000 vehicles per hour per lane. Driveway exit capacities are dependent upon the amount of traffic/congestion on the frontage streets. The proposed Site driveway is expected to provide an exit capacity of between 400 and 500 vehicles per hour, due primarily to the relatively unimpeded exit operations resulting from the nominal amount of non-Project traffic on Pacific Avenue adjacent to the Project Site.

A review of the peak Project driveway volumes indicates that the total peak hour vehicular demand at the Project's driveway for both inbound and outbound traffic would be substantially below these levels during both the AM and PM peak periods. As such, adequate entry capacity is provided to minimize any on-street vehicular queuing, and exiting capacities are sufficient to accommodate the demands of the Project without creating internal vehicular queues or on-site congestion. Therefore, the Project parking access location would operate adequately, with no external vehicular queuing on the fronting streets, and no significant internal queuing within the parking structure, and no impact would occur.

Revised Project

The revised Project's vehicular access is expected to continue to be provided along its Pacific Avenue frontage, although rather than the single, shared commercial and residential access driveway provided by the originally-proposed Project, it is possible that a second, Project-resident only driveway would also be added, which would provide access to a potential new mezzanine parking level.

It is acknowledged that the potential placement of two driveways (along with a potential loading dock driveway) along this short segment of Pacific Avenue is not preferred by LADOT, due to potential conflicts between the entering and exiting traffic at the driveways, and to minimize any disruption of traffic flows on the adjacent streets due to driveway activity. It is expected that any such conflicts or disruptions would be minimal, since as detailed in the March 2011 Traffic Study, the subject segment of Pacific Avenue exhibits relatively low traffic volumes, and project-related driveway traffic volumes are expected to be easily accommodated by the site's driveway(s).

In addition, the modified Project's driveway locations and operations would need to be reviewed and approved by LADOT before the Project can begin construction. As such, review and approval of the Project's vehicular access plans would assure that the site's driveways are acceptable to the City, and as such, less than significant access-related impacts are expected.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

The City of Los Angeles Department of Transportation (LADOT) provides bicycle paths, lanes, routes, and sharrows on City streets. According to the 2010 Bike Plan, the nearest facility is an existing bike lane on Culver Boulevard from Pacific Avenue to Nicholson Street.[80] In addition, in the vicinity of the Project Site, Pershing Drive is listed as a bicycle friendly street. Overall, the Project would not conflict with any bikeways or pedestrian pathways.

Transit Impacts

As described previously, in order to present the most conservative analysis of the potential traffic impacts of the Project to the nearby study intersections, no additional use of public transportation by Project residents, employees, or visitors beyond that intrinsically included in the ITE and/or CTCSP trip generation rates was assumed. However, for purposes of assessing potential Project-related impacts to the area transit system, it was assumed that up to approximately five percent of the total resident, employee, and visitor trips to and from the Proposed Project could utilize the convenient bus service serving the Site. The original Project resulted in a potential Project-related increase in area transit ridership of approximately 97 persons per day, including about six additional riders during the AM peak hour, and about 13 additional riders during the PM peak hour. This nominal level of potential new rider demand was not expected to result in any significant transit-related impacts to the existing bus service in the area.

---

[80] *Los Angeles Department of City Planning, 2010 Bicycle Plan: http://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf, accessed March 14, 2013.*

Using the revised Project trip generation assumption, the number of revised Project trips that might travel to and from the Project via the existing transit services was calculated. Based on the revised Project trip calculations provided above, it was estimated that approximately 49 daily Project-related trips, including approximately three trips (one inbound, two outbound) during the AM peak hour, and approximately six trips (three inbound, three outbound) during the PM peak hour, could utilize the area's transit facilities rather than in privately-owned vehicles.

Applying a typical vehicle occupancy ratio of 1.2 persons per vehicle, and assuming the Project's entire transit utilization would occur due to new bus ridership, it was estimated that the Project could result in a maximum increase in area transit ridership of approximately 59 persons per day, including about four persons (one inbound, three outbound) during the AM peak hour, and about seven people (four inbound, three outbound) during the PM peak hour. Although only one bus line serves the Project Site directly, this nominal level of new rider demand would not result in any significant transit-related impacts to the existing bus service in the area, and no impact would occur.

17. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Regional Water Quality Control Board (LARWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LARWQCB's Water Quality Control Plan for the Los Angeles Region (the "Basin Plan") establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.[81] Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants, in accordance with the treatment requirements of the LARWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP),[82] which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment.[83, 84] Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean

---

[81] *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

[82] *Hyperion Sanitary Sewer System, Sewer System Master Plan, May 2011, pg 5: http://www.lasewers.org/ssmp/pdfs/2011/Complete_SSMP_Hyperion-May_2011.pdf*

[83] *City of LA, Wastewater System: http://www.lacitysan.org/irp/Wastewater.htm, accessed October 4, 2012.*

[84] *Integrated Resources Plan ,Summary Report, pg 2-15: http://www.lacitysan.org/irp/documents/Summary_Report-Brief_Description_of_Key_Facilities_Planning.pdf, accessed October 4, 2012.*

and is consistent with the LARWQCB's discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd.[85] Thus, there is approximately 88 mgd available capacity.

However, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd. Prior to the issuance of building permits, the Project would be required to demonstrate compliance with the monthly allocation set forth by the ordinance. Further, the Project would not be able to connect to the City's wastewater system until capacity is available and, therefore, would not cause LABS to exceed LAWQCB treatment requirements. In addition, the HTP is a public facility and is also subject to the State's wastewater treatment requirements.

As shown in Table IV-39, it is estimated that the Project would generate approximately 12,680 gallons per day (gpd) (or 0.01268 mgd) of wastewater. The wastewater generated by the Project would be similar to commercial and residential uses in the area surrounding the Project Site. No industrial discharge into the wastewater or drainage system would occur.

As described above, there is adequate treatment capacity within the HTP system (approximately 88 mgd) to treat the wastewater generated as a result of the Project. Thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As the HTP complies with the State's wastewater treatment requirements, and as the Project's wastewater generation is well within the existing capacity, the Project would not exceed the wastewater treatment requirements of the LARWQCB. Furthermore, compliance with the Mitigation Measures in this Section are expected to reduce any potential impacts to a less than significant level.

Table IV-39
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Commercial	14,500 sf	80 gpd / 1,000 sf	1,160
Residential	72 DU	160 gpd / DU	11,520
		Total	**12,680**

Note: sf = square feet; gpd = gallons per day. Residential Apartment 2-bedroom rate is used for a conservative analysis.
Source: City of Los Angles, L.A. CEQA Thresholds Guide, 2006, Exhibit M-2-12.
Table: CAJA Environmental Services, October 2012.

[85] *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm, accessed October 4, 2012.*

Mitigation Measures

XVII-80. Utilities (Water Treatment or Distribution)

- The project shall include a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak hours.
- A grey water system to reuse wastewater from the project.
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and
- New wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

Wastewater Treatment Facilities and Existing Infrastructure

The Project Site would be served by the LABS, which provides municipal wastewater services to the City of Los Angeles. As discussed under the response to 17(a), above, the Project is anticipated to generate approximately 12,680 gpd of wastewater.

As the Project Site is surrounded by urban development, it could be adequately served by the existing wastewater conveyance system. However, as part of the building permit process, the lead agency would confirm that there is sufficient capacity in local and trunk lines to accommodate the Project's wastewater flows. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. Implementation of this prescribed mitigation measure would ensure that the Project's impacts with respect to the wastewater conveyance system would be less than significant.

Wastewater generated by the Project would continue to be conveyed to the HTP. The HTP has a design capacity to treat approximately 450 mgd and currently treats an average daily flow of approximately 362 mgd. Thus, a remaining capacity of approximately 88 mgd is sufficient to treat the Project's estimated increase of approximately 0.01268 mgd of wastewater.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Project and would help reduce the amount of Project-generated wastewater.

Therefore, compliance with LABS and the Mitigation Measures in this Section will reduce any potential impacts to wastewater treatment facilities and existing infrastructure to a less than significant level.

Water Treatment Facilities and Existing Infrastructure

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. As shown in Table IV-40, operation of the Project would result in water demand of approximately 15,079 gpd (or 0.01508 mgd).

Table IV-40
Project Estimated Water Consumption

Land Use	Size	Water Consumption Rates	Total (gpd)
Commercial	14,500 sf	102.4 gpd / 1,000 sf	1,484.8
Residential	72 DU	188.8 gpd / DU	13,594
		Total	**15,079**

Note: sf = square feet; gpd = gallons per day. Residential Apartment 2-bedroom rate is used to present a conservative analysis.
Source: City of Los Angles, L.A. CEQA Thresholds Guide, 2006, Exhibit M-2-12.
Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential of the wastewater generation rates.
Table: CAJA Environmental Services, October 2012.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

The Project's water consumption increase of approximately 0.01508 mgd represents approximately 0.03 percent and 0.001 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities would be less than significant as a result of the Project.

LADWP can generally supply water to development project within its service area, except under extraordinary circumstances. Additionally, given the incremental increase in water consumption for the Project, and compliance with applicable water conservation ordinance and regulations such as California Code of Regulations (CCR), Title 20, Section 1604; CCR Title 22; City Ordinances 165,004 and 166,080; the Project would not require or result in the construction of new water treatment facilities. The Project would also achieve the following water efficiency standards:

- Minimum 20% reduction in potable water use within the building through installation of high-efficiency and very high-efficiency plumbing fixtures and fittings.

- Minimum 30% reduction in overall irrigation demand through the installation of a high-efficiency irrigation system.

- Installation of a weather- or soil moisture-based irrigation controller.

Notwithstanding the above, as part of the building permit process, the lead agency would confirm that there is sufficient capacity in the water supply and infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. As such, the Project's impacts to the water conveyance system would be less than significant. .

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units.

Thus, the Project is not subject to SB 221 as it does not include a residential development of more than 500 dwelling units. The Project includes 72 dwelling units.

SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

(a) Residential developments of more than 500 dwelling units;

(b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

(c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;

(d) Hotels or motels with more than 500 rooms;

(e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;

(f) Mixed use projects containing any of the foregoing; or

(g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

The Project is not subject to SB 610, as it does not meet any of the listed requirements, and therefore a water supply assessment is not required.

Mitigation Measures

XVII-80. Utilities (Water Treatment or Distribution)

- The project shall include a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak hours.
- A grey water system to reuse wastewater from the project.
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and
- New wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the project site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Runoff currently flows toward existing storm drain system. Development of the Project would alter the amount of runoff the Project Site by reducing the impervious surface. The Project Site is currently undeveloped and is covered with dirt and shrubs.[86] However, the Project would reduce impervious surface area by using permeable pavement materials (such as pervious concrete/asphalt, unit pavers, turf block, and granular materials) where appropriate. In addition, the Project would include an efficient irrigation system to minimize runoff. The irrigation system would include drip irrigation for shrubs, shutoff devices to prevent irrigation after significant precipitation, and flow reducers. As such, the Project would result in a less than significant impact with respect to runoff in storm drains.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that

[86] *One vacant commercial building located near the southern tip of the Project Site was previously demolished, and that demolition has been accounted for in the analysis contained in this IS/MND.*

existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

The Project would use 0.01508 mgd (or 17 acre-feet per year).[87]

The 2010 Urban Water Management Plan projects a supply of 555,477 AFY in 2015.[88] Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand.

Overall, any project that is consistent with the General Plan has been taken into account in the planned growth in water demand. Therefore, the Project's water supply needs have already been accommodated within water supply projections for the region, and a less than significant impact would occur. In addition, the Project would include an efficient irrigation system (as described under 17(c), above), and would also include high efficiency toilets, clothes washers, and dishwashers, as well as low flow faucets, which would further reduce the water demands of the Project. Furthermore, compliance with the mitigation measures in this section would reduce any potential impacts to a less than significant level.

Mitigation Measures

XVII-10. Utilities (Local Water Supplies - Landscaping)

- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
    - Weather-based irrigation controller with rain shutoff
    - Matched precipitation (flow) rates for sprinkler heads
    - Drip/microspray/subsurface irrigation where appropriate
    - Minimum irrigation system distribution uniformity of 75 percent
    - Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
    - Use of landscape contouring to minimize precipitation runoff

---

87 *1 acre-foot = 325,851 gallons*

88 *2010 Urban Water Management Plan, Los Angeles, pg. 20: http://www.ladwp.com/ladwp/cms/ladwp014334.pdf, October 17, 2011.*

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.

XVII-20. Utilities (Local Water Supplies - All New Construction)

- If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-30. Utilities (Local Water Supplies - New Commercial or Industrial)

- All restroom faucets shall be of a self-closing design.

XVII-40. Utilities (Local Water Supplies - New Residential)

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

XVII-60. Utilities (Local Water Supplies - Restaurant, Bar, or Nightclub)

- Install/retrofit high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install/retrofit restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Install/retrofit and utilize only restroom faucets of a self-closing design.

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

e) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The Project's generation of 0.01268 mgd of wastewater would be accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Compliance with the Mitigation Measures in this Section is expected to reduce any potential impacts to a less than significant level.

Mitigation Measures

XVII-80. Utilities (Water Treatment or Distribution)

- The project shall include a holding tank large enough to hold three times the project daily wastewater flow so that the tank would hold all project wastewater during peak wastewater flow periods for discharge into the wastewater collection system during off-peak hours.
- A grey water system to reuse wastewater from the project.
- Offset excess wastewater generation by restricting the wastewater generation of other land uses within the same service area (e.g., by dedicating open space); and
- New wastewater treatment or conveyance infrastructure, or capacity enhancing alterations to existing systems.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste from commercial developments within the City is contracted to private waste haulers. Most waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill").

According to the State permit issued on July 7, 2008 (the next permit review date is July 7, 2013), the Sunshine Canyon Landfill is estimated to close in 2037. It has approximately 112.3 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy, and a maximum permitted daily intake of 12,100 tons per day (tpd).[89] For a point of reference, 1.7 cubic yards is equal one ton of solid waste.[90] As of June 30, 2011, Sunshine Canyon Landfill accepted approximately 9,000 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[91] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 3,100 tpd during the week.

Construction

Construction of the Project would generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the State to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged to the maximum extent feasible. Materials not recycled would be disposed of at local landfills.

Construction of the 14,500 square feet of new commercial space would generate approximately 58,290 pounds (29 tons) of construction waste.[92] Construction of 72 new residential would generate approximately 315,360 pounds (158 tons) of construction waste.[93] Project construction would generate a total amount of construction waste of 187 tons.

Construction would last approximately 22 months, and therefore, Project construction would generate approximately 0.425 tons per day of construction waste.[94]

Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Because of the recycling of most of the solid waste generated by the construction of the Project, short-term construction impacts to landfills and solid waste services would be less than significant.

---

89 *State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, accessed October 4, 2012.*

90 *Sunshine Canyon Landfill: http://www.sunshinecanyonlandfill.com/home/Future.html, accessed October 4, 2012.*

91 *Sunshine Canyon Landfill Newsletter, Volume 7, Issue 2, July 2011, website: http://www.sunshinecanyonlandfill.com/home/newsletter/July_2011_Newsletter.pdf, accessed October 4, 2012.*

92 *Based on 4.02 pounds of nonresidential construction per square feet and 4.38 lbs for residential construction per square feet (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).*

93 *Assuming 1,000 sf per unit and residential areas (like common areas and hallways). Based on 4.38 lbs for residential construction multiplied by 238,430 sf of new residential (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).*

94 *22 months x 20 working days per month = 440 working days. 187 tons / 40 days = 0.425 tpd.*

Therefore compliance with the Mitigation Measures in this Section are expected to reduce any potential impacts to a less than significant level.

Operation

As shown on Table IV-41, the Project would generate approximately 954 pounds per day of solid waste (or 0.48 tons per day). As discussed above, the Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.48 tpd increase in solid waste resulting from the Project.

In addition, pursuant to AB 939, each city and county in the State must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting.

There is sufficient landfill capacity to accommodate the solid waste generated by the Project.

Table IV-41
Project Estimated Solid Waste

Land Use	Size	Solid Waste Rates	Total (lbs/day)
Commercial	14,500 sf	5 lbs/1,000 sf	73
Residential	72 DU	12.23 lbs/DU	881
		Total	**954**

Note: sf = square feet;, lbs = pounds
Source: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/
Table: CAJA Environmental Services, October 2012.

The City has a standard requirement that applies to all proposed residential developments of 4 or more units which states that the development must set aside a recycling area or room for onsite recycling activities. Therefore compliance with the Mitigation Measures in this Section are expected to reduce any potential impacts, related to construction activities and regular operations, to a less than significant level.

Mitigation Measures

XVII-90. Utilities (Solid Waste Recycling)

- (Operational) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- (Construction/Demolition) Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department

of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.

- (Construction/Demolition) To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

XVII-100. Utilities (Solid Waste Disposal)

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project would be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of Project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Management Policy Plan, which is the long-range solid waste management policy plan for the City, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687, regarding recycling for all new construction and other recycling measures; the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials; and implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction.

Overall, waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with Federal, State, and local regulations. Compliance with the Mitigation Measures in this Section will reduce any potential impacts to a less than significant level.

Mitigation Measures

XVII-90. Utilities (Solid Waste Recycling)

- (Operational) Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- (Construction/Demolition) Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- (Construction/Demolition) To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

XVII-100. Utilities (Solid Waste Disposal)

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project is located in a densely populated urban area and would have less than significant impacts, with mitigation, with respect to biological and cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, the Project would result in less than significant impacts related to these areas.

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)?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project would not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft IS/MND, for the reasons discussed below.

The locations of the 26 identified related projects assumed in this analysis are described in Table IV-32. A majority of the related projects are in the City of Los Angeles, while nine (Nos. 10 through 18) are located in Marina Del Rey (unincorporated Los Angeles County). The nearest related projects to the Project Site are:

- No. 19 – Office, 7,994 sf;
- No. 25 – Mixed-Use, 29 single-family homes and 4,000 sf retail; and
- No. 26 – Mixed-Use, 63 apartment units, 11,000 sf pharmacy, and removal of 4,000 sf restaurant.

The 23 other related projects are at least one mile from the Project Site, which ensures that any other localized impacts of the related projects would not combine with the Project to result in a cumulative impact.

Aesthetics

Increased development associated with buildout of the related projects would alter the visual image of each area surrounding those sites. Development of the Project in conjunction with other development in the Project area would result in an intensification of land uses in the City of Los Angeles and the Venice, Westchester, Del Rey areas as well as unincorporated Marina Del Rey. As required by the City of Los Angeles, the project design for each of the related projects would be reviewed by the City of Los Angeles Planning Department for consistency with applicable City codes and regulations prior to final approval. Additionally, a majority of the related projects are not located in close enough proximity to the Project Site to either be visible from the Project Site or to see the Project Site from the related project location.

As described above, the Project would partially obstruct ocean views from Vista Del Mar and Montreal Street. While development of Related Project Nos. 25 and 26 (the closest related projects to the Project Site) may further obstruct views from Vista Del Mar and Montreal Street, existing views from Culver Boulevard and Pacific Avenue would remain. As such, cumulative aesthetic impacts would be less than significant, and the contribution of the Project to this impact would not be considerable.

Agriculture

As the development of the project would have no impact on agricultural resources, the Project cannot combine with other development in the area to form a cumulative impact on agricultural resources. Therefore, no cumulative impact with respect to agricultural resources would occur.

Air Quality

As described above in Section 3, Air Quality, the Project would not contribute cumulatively considerable net increases in any criteria pollutant emissions. Specifically, growth associated with the Project would be consistent with assumptions from the region's 2012 AQMP that addresses cumulative regional emissions of ozone precursors. Further, the Project would comply with all applicable control measures, rules and regulations from the 2012 AQMP. While there are other development projects in the area that are slated for potential construction during the same two-year period, they would be required to meet localized thresholds of significance to avoid any potential cumulative impacts on local sensitive receptors in the Playa del Rey community. Future development that could contribute to cumulative localized impacts would be required to address LST thresholds and perform dispersion modeling to demonstrate that potential violations of health standards would not occur. In addition, the Project's estimated operational emissions are based on future traffic conditions, which include both the related projects and a 1.0 percent ambient growth factor, which is compounded annually. As such, cumulative impacts with respect to air quality would be less than significant.

Biological Resources

Biological resources are site-specific, such that each related project would need to be evaluated within its own site-specific context for the presence of biological resources. In addition, as described above, the Project would result in no impact with respect to biological resources, and as such, would not combine with other development in the area to form a cumulative impact on biological resources.

Cultural Resources

Development of the Project in conjunction with other development in the City would result in further development in an already urban area. Therefore, it is unlikely that archaeological and paleontological resources exist on the surfaces of other development sites in the Project area. Nevertheless, there remains the remote possibility that unknown subsurface archaeological and paleontological remains could be encountered during excavation or grading for the related projects. Cultural resources are site-specific, such that each related project would need to be evaluated within its own site-specific context. Therefore, periodic monitoring during construction is recommended for the related projects, consistent with standard City of Los Angeles Conditions of Approval, to identify any previously unidentified archaeological and paleontological resources uncovered by related project construction activity. This would reduce potential cumulative impacts to less than significant.

Geology and Soils

Development of the Project in conjunction with the related projects would result in the further "infilling" of various land uses in the City of Los Angeles. Geotechnical hazards are generally site-specific in nature

and there is little, if any, cumulative relationship between development of the Project and the related projects. As such, construction of the related projects are not anticipated to combine with the Project to cumulatively expose people or structures to geologic hazards such as landslides and unstable soils, increase the potential for soil erosion and the loss of topsoil, or expose additional people to seismic hazards. Therefore, no significant cumulative geological impacts are anticipated from implementation of the Project and the related projects.

Greenhouse Gas Emissions

CARB's AB 32 Scoping Plan provides the basis for policies that would reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, each related project is judged against its consistency with the AB 32 Scoping Plan to determine whether it would result in adverse cumulative impacts to global climate change. The Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the Project's cumulative impact on climate change is considered less than significant.

Hazards and Hazardous Materials

Development of the Project in combination with the related projects has the potential to increase the release of hazardous materials into the environment. However, as described above, the Project's impacts with respect to hazardous materials would be less than significant. With respect to the presence of hazardous substances associated with the related projects, each related project would be evaluated for potential threats to public safety. This would occur for each individual project, in conjunction with development proposals on these properties. Furthermore, local municipalities are required to follow local, State, and federal laws regarding hazardous materials. Therefore, assuming compliance with local, State and federal laws pertaining to hazardous materials, cumulative impacts would be considered less than significant.

Hydrology and Water Quality

Development of the Project in conjunction with the related projects would result in the further infilling of uses in an already urbanized area. The Project Site and surrounding areas are served by storm drains. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all of the related projects, would also drain to the surrounding streets and storm drain system. Therefore, cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. In addition, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would be less than significant.

Land Use and Planning

Development of the Project in conjunction with other projects in the Project vicinity would result in the further infilling of uses in the City of Los Angeles and the Venice, Westchester, Del Rey areas as well as unincorporated Marina Del Rey. Based on information available regarding the related projects, it is

reasonable to assume that development of the related projects would implement and support local and regional planning goals and policies. In addition, each of the related projects would be required to demonstrate compliance with their respective zoning and land use designations, or request a discretionary action in the case of inconsistencies. Overall, the Project would not contribute to a cumulative land use impact, and cumulative land use impacts would be considered to be less than significant.

Mineral Resources

As the development of the Project would have no impact on mineral resources, the Project would not combine with other development in the area to form a cumulative impact on mineral resources. Therefore, no cumulative impact with respect to mineral resources would occur.

Noise

Development of the Project in conjunction with the related projects would result in an increase in construction-related noise as well as operational noise (primarily from traffic). However, each of the related projects located in the City of Los Angeles would be subject to the Section 112.05 of the Los Angeles Municipal Code, which reduces construction noise impacts to the maximum extent feasible by prohibiting loud, unnecessary, and unusual construction noise within 500 feet from any residential zone, and LAMC Section 41.40, which limits the hours of allowable construction activities. Conformance with these City codes would reduce construction-related noise for each of the related projects. Furthermore, "future year (2015)" traffic volumes are based on cumulative traffic conditions, which already take into account expected development of related projects identified in the surrounding area, as well as a 1.0 percent ambient growth factor, which is compounded annually. As a result, cumulative noise impacts from traffic would be considered less than significant. Overall, the Project would not contribute to a cumulatively considerable noise impact and cumulative noise impacts would be less than significant.

Population and Housing

Population and housing growth is not considered to be a direct effect on the environment under CEQA. Secondary or indirect impacts, such as increased traffic or noise, may be significant and may result in physical changes cause by population and housing growth. The related projects would contribute to population and employment growth in the Project vicinity. However, these projects would be constrained by the same restrictions as the Project, and are anticipated to be developed in accordance with the City of Los Angeles General Plan (for City of Los Angeles related projects) and Los Angeles County General Plan (for the unincorporated Marina Del Rey related projects). Generally, projects that conform to the General Plan have been taken into account in future infrastructure and service projections. As such, no significant cumulative impact with respect to population and housing is anticipated to occur.

Public Services and Recreation

The Project, in combination with the related projects, would result in the further infilling of an already urbanized portion of the City, increasing the demand for public services. With respect to cumulative demand

on public services, each cumulative project in the City of Los Angeles would be individually subject to review by LAFD and LAPD, and would be required to comply with all applicable safety requirements. Further, funding for any new facilities would be funded via existing mechanisms (i.e., sales taxes and government funding) to which all cumulative developments would contribute. All City of Los Angeles cumulative projects would also be required to pay any applicable developer fees to the LAUSD, and Quimby and/or Park and Recreation fees to the LADRP, for development of residential projects.

The related projects in Marina Del Rey (unincorporated Los Angeles County) would be served by the Sheriff's Department, County Fire, and County Library departments. Thus, these related projects would not impact the services of the Project. The LAUSD also serves the County related projects, albeit at a variety of schools due to the geographic distribution of projects. Like the Proposed Project and City of Los Angeles related project, the related projects located in unincorporated Los Angeles County would be required to pay any applicable developer fees to the LAUSD.

As such, cumulative demands on public services would be less than significant.

Transportation and Traffic

The future study year 2015 traffic volumes were estimated through the use of a 1.0 percent ambient traffic growth factor, compounded annually. However, in addition to the assumed 1.0 percent annual ambient traffic growth factor, the forecasts of future (year 2015) traffic volumes also included traffic generated by 26 "related projects" (ongoing or proposed other development within the study area that could potentially affect future traffic conditions in the project vicinity).[95] The Project's incremental traffic impacts are not considered to be significant at any of the six study intersections under either the "existing" year 2010 or forecast future year 2015 conditions.[96] As such, the Project would not contribute to a cumulative traffic impact.

Utilities and Services Systems

Impacts with respect to water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures, where applicable. These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects.

For projects that meet the requirements established in the State Water Code, a Water Supply Assessment demonstrating sufficient water availability is required on a project-by-project basis. Most of the related projects are below these requirements (except potentially Related Project Nos. 11, 12, and 22). Additionally, similar to the Project, each related project would be required to comply with the City and State water

---

[95] *Page 10, Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Mixed-Use Project, September 30, 2013.*

[96] *Page 24, Hirsch/Green Transportation, Supplemental Traffic Impact Analyses for 138 Culver Mixed-Use Project, September 30, 2013.*

conservation programs. Therefore, cumulative impacts to water supply would be less than significant. Specific sewer and water infrastructure is site-specific and evaluated on a case-by-case basis.

The Hyperion Treatment Plant has a design capacity to treat approximately 450 mgd and currently treats an average daily flow of approximately 362 mgd.[97] Thus, there is a remaining capacity of approximately 88 mgd, which would be sufficient to treat the related projects in addition to the Project. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season, which would be sufficient to treat the related projects in addition to the Project.

According to CalRecycle, the Sunshine Canyon Landfill is estimated to close in 2037. It has approximately 112.3 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy, and a maximum permitted daily intake of 12,100 tons per day (tpd).[98] As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[99] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday. In addition, the Puente Hills Intermodal Facility is estimated to be completed in 2014[100] and would provide a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.[101] The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.[102] Therefore, there would be sufficient landfill capacity to accommodate both the Project and the related projects.

The overall sewer treatment system (treatment plants), water supplies, and landfills contain adequate capacity to accommodate the related projects given their sizes and the amounts of capacity available. Therefore, the Project's incremental contribution to cumulative impacts would be less than significant, but the related projects would likely require mitigation measures similar to those required of the Proposed Project.

---

97 *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm, accessed November 22, 2013.*

98 *State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, accessed November 22, 2013.*

99 *Sunshine Canyon Landfill Newsletter, Fall 2013, website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, November 22, 2013.*

100 *County Sanitation Districts, Waste-By-Rail: http://www.lacsd.org/solidwaste/wbr/default.asp, October 16, 2013.*

101 *Puente Hills Landfill: http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708, October 16, 2013.*

102 *Mesquite Regional Landfill: http://www.mrlf.org/index.php?pid=5, accessed October 16, 2013.*

Mitigation Measures

XVIII-10. Cumulative Impacts. There may be environmental impacts which are individually limited, but significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. However, these cumulative impacts will be mitigated to a less than significant level though compliance with the above mitigation measures.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. After implementation of the mitigation measures provided above, the Project would not have any significant impacts.

Mitigation Measures

XVIII-20. Effects on Human Beings. The project has potential environmental effects which cause substantial adverse effects on human beings, either directly or indirectly. However, these potential impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

XVIII-30. End. The conditions outlined in this proposed mitigated negative declaration which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on the face page of this document. Therefore, it is concluded that no significant impacts are apparent which might result from this project's implementation.