

**Addendum to the  
Mitigated Negative Declaration and Errata for the Pacific  
Palisades Village Project  
State Clearinghouse No. 2016021075**

*Prepared for:*

**City of Los Angeles**  
Department of City Planning  
200 North Spring Street  
Los Angeles, California 90012

*Prepared by:*

**DUDEK**  
38 North Marengo Avenue  
Pasadena, California 91101  
*Contact: Jane Gray*

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# Addendum to the Mitigated Negative Declaration and Errata for the Pacific Palisades Village Project

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## ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ADT	average daily trips
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
dBA	A-weighted decibels
GHG	greenhouse gas
$L_{eq}$	equivalent sound level
LOS	level of service
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MT CO <sub>2</sub> E	metric tons carbon dioxide equivalent
PPCV	Pacific Palisades Commercial Village
VOC	volatile organic compound

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## **ADDENDUM TO THE MITIGATED NEGATIVE DECLARATION AND ERRATA PREPARED FOR THE PACIFIC PALISADES VILLAGE PROJECT**

This Addendum to the Mitigated Negative Declaration has been prepared in response to minor changes in the Pacific Palisades Village Project, specifically: 1) the addition of one more level of underground parking, which would result in a total of three underground parking levels for a total of 560 spaces as opposed to two levels of underground parking in the Proposed Project; 2) increase in the overall square footage proposed residential space including circulation and common areas while maintaining the same number of units (8) from a total of 10,000 SF as was analyzed in the Mitigated Negative Declaration (MND) in February 2016 and the Errata (April 2016) for the original Project (referred to in this Addendum as the Original Project) to a total of 17,500 SF; and 3) and additional 1,250 SF of community room space. The Project as updated with these minor changes is referred to in this Addendum as the Updated Project.

The purpose of this addendum is to determine whether these changes to the Original Project require substantial revisions to the MND (February 2016) and Errata (April 2016). This analysis focuses on whether: 1) the addition of one more level of parking; 2) an increase in the total square footage of all proposed residential space (while maintaining the same unit count at 8) from 10,000 SF to 17,500 SF; and 3) the addition of a new community room space of 1,250 SF would impact any of the issue areas assessed in the MND (February 2016) and Errata (April 2016). The analysis contained in this Addendum confirms that the addition of one more level of parking, for a total of three underground parking levels (minimum 560 spaces), an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF, and addition of a 1,250 SF community room are not more impactful than the Original Project. In fact, all impact levels remain the same or are less impactful than those identified in the MND (February 2016) and Errata (April 2016). Therefore, recirculation of the MND (February 2016) and Errata (April 2016) is not required according to the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15073.5).

### **Project Description**

The Project Site is located within the Brentwood–Pacific Palisades Community Plan area and in the area of the Pacific Palisades Commercial Village (PPCV) and Neighborhood Specific Plan (Specific Plan). The Project Site has historically been developed with a surface parking lot (1.00 acre) and approximately 51,850 square feet of structures, including the two previously demolished buildings (43,875 square feet of structures excluding the demolished portions). The Variant Site is currently developed with a surface parking lot (1.00 acre) and 50,938 square feet of structures. The difference

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of 912 square feet is attributable to the fact that the Project Site includes the existing gas station, and the Variant Site does not include the gas station.

Regional access to the Project Site is provided by interstate highways, a state route, arterial roadways, and local streets. Interstate 405 is located approximately 5.5 miles northeast of the site, and State Route 1 (Pacific Coast Highway) is located approximately 1.4 miles to the south. The northern portion of the Project Site is traversed by Swarthmore Avenue, which is designated as a Local Street, with a public right-of-way width of 70 feet. Local access to the Project Site is provided by a number of arterial and local roadways. Access to the northerly portions of the Project Site is provided via Albright Street from the north or via Swarthmore Avenue or Monument Street from Sunset Boulevard and the south. The southern portions of the Project Site, including the Sunset Properties, are accessed via Sunset Boulevard and a public alleyway from Swarthmore Avenue or Monument Street. Under the Mobility Plan 2035, Sunset Boulevard is designated as an Avenue II along the Project Site and as an Avenue I northwest of Swarthmore Avenue.

Immediately across the Project Site, along Monument and Albright Streets, are two-story single-family residential dwelling units, all with the same land use designation of Low Residential and zoning of R1-1. The residential properties to the north and east are not located in the PPCV Specific Plan area and are fronting local streets. The properties west and south of the Project Site are within the PPCV Specific Plan area. Immediately to the west and abutting the Project Site is a three-story multiple-family residential building with a Medium Residential land use designation and a [Q]R3-1 zoning. The properties to the south, along Swarthmore Avenue and Sunset Boulevard, are designated as Community Commercial, with C2-1VL zoning. The commercial buildings are one- and two-story buildings with continuous building frontage and distinctive facades.

The Updated Project entails the demolition of all existing structures on the Project Site and the redevelopment of the Project Site with the following uses, for a total developed floor area of approximately 124,965 square feet (square footages below are approximate):

- 53,415 square feet of retail
- 11,000 square feet of specialty grocer
- 2,500 square feet of walk-in bank
- 12,000 square feet of restaurant space
- 13,100 square feet of cinema (300 seats)
- 17,500 square feet of residential space

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- 4,800 square feet of office space
- 2,400 square feet of property management office
- 1,250 square feet of community room
- 7,000 square feet of above-grade storage
- 10,000 square feet of open space
- 560 parking stalls

## Environmental Impacts

### A Aesthetics and Visual Resources

The MND (February 2016) and Errata (April 2016) concluded that the Original Project would not exceed applicable standards of significance and would not result in significant adverse impacts related to aesthetics with the implementation of mitigation measure (MM) **AES-1**.

The Updated Project would be required to implement **MM-AES-1** identified in the MND (February 2016) and Errata (April 2016) to avoid any potential impacts from lighting and signage.

The Updated Project would result in the addition of one more level of underground parking, for a total of three. The additional level of underground parking would be placed at a lower depth, below the currently proposed two levels of underground parking. The addition of one more level of underground parking would not increase the height of the buildings previously analyzed in the MND (February 2016) and Errata (April 2016). In addition, the project would entail the addition of 1,250 SF of community room, and an increase in square footage of all proposed residential space (while maintaining unit count at 8) from a total of 10,000 SF to a total of 17,500 SF. These minor changes would be accommodated within the proposed project area as previously analyzed and determined to have no impact on aesthetic and visual resources. The additional square footage will be consistent with the character, massing and height of the structures analyzed in the February 2016 MND and Errata (April 2016). Moreover, the additional 7,500 SF of residential floor area will be distributed throughout the originally proposed footprint with modest additions of space added to each unit and the lobby such that proportion of the structures' visual integrity are maintained and visual simulations previously prepared are largely consistent with the additional square footage. Therefore the previous environmental analyses in the MND (February 2016) and Errata (April 2016) addressed all potential aesthetic impacts. Views of the Project Site and surrounding area do not include any visual resources unique to the region or any designated scenic vistas or viewpoints. The

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buildings would not obstruct any scenic vistas in the vicinity of the Project Site or those visible from the highway. The buildings would be designed with a similar aesthetic to the aesthetic previously identified for the buildings. In addition, the Updated Project would maintain existing architectural and development patterns in the neighborhood.

Therefore, with the incorporation of **MM-AES-1** as identified in the MND (February 2016) and Errata (April 2016), the Updated Project would not result in significant adverse aesthetic impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016). There would be no changes to this issue area or any new impacts as a result of the minor changes proposed.

### **B Agriculture and Forestry Resources**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project would not exceed applicable standards of significance and would not result in significant adverse impacts related to agriculture and forestry resources.

The Project Site is still located within the city limits of Los Angeles in a highly urbanized area. The California Department of Conservation Farmland Mapping and Monitoring Program (DOC 2015) continue to not designate the Project Site as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project Site is not located on or adjacent to any lands with Williamson Act contracts, nor does the Project Site conflict with existing zoning for agricultural use. The entire Project Site does not conflict with existing zoning for agricultural use or a Williamson Act contract.

The construction of the Updated Project would not occur on land currently used or designated as forestland or timber production and would not conflict with the zoning or cause the rezoning of forestland or timberland. No forestland would be lost or converted to non-forest use as a result of the Updated Project, and the Updated Project would not result in the conversion of additional farmland to non-agricultural use.

The Updated Project would add one more level of underground parking, increase the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF, and add a community room of 1,250 SF. None of these minor project changes would increase the level of any impacts previously identified in the MND (February 2016) and Errata (April 2016), and would not create any new potential impacts with respect to agricultural resources. None of the Updated Project elements involves new significant impacts or a substantial increase in previously identified impacts to agricultural resources.

Therefore, the Updated Project would not result in significant adverse agricultural or forestry impacts. This finding is consistent with the conclusion reached in the MND (February 2016)

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and Errata (April 2016). There would be no changes to this issue area or any new impacts as a result of the addition of one level of underground parking, an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF and addition of 1,250 SF of community room.

### C Air Quality

The MND (February 2016) and Errata (April 2016) concluded the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to air quality during construction or operations. Although the Updated Project includes an additional level of parking, because the total volume of excavation and construction schedule will not differ from what was analyzed in the MND (February 2016) and Errata (April 2016), and because construction air quality impacts are based on daily rates of emissions, the addition of a third level of underground parking will not increase construction related air quality impacts over those analyzed in the MND (February 2016) and Errata (April 2016). Furthermore, construction parameters related to construction of the 1,250 square feet of community room and the minor residential additions are negligible in terms of the overall construction schedule. The operational air emissions of the Updated Project (i.e., the mix of uses and square footages reflected in the Project Description section of the Errata (April 2016) with increased garage square footage to reflect the proposed third level of underground parking, increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF, and addition of 1,250 SF community room were remodeled using the California Emissions Estimator Model (CalEEMod). The results are reflected in the tables that follow.

**Table 1**  
**Estimated Maximum Daily Net Operational Emissions – Updated Project**

Emission Source	VOCs (lb/day)	NO <sub>x</sub> (lb/day)	CO (lb/day)	SO <sub>x</sub> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)
<i>Proposed Project</i>						
Area Sources	9.15	0.01	0.74	0.00	0.01	0.01
Energy	0.11	0.97	0.81	0.01	0.07	0.07
Mobile Sources	20.01	46.50	190.54	0.44	30.43	8.57
<i>Total</i>	<i>29.27</i>	<i>47.48</i>	<i>192.09</i>	<i>0.45</i>	<i>30.51</i>	<i>8.65</i>
<i>Existing Base</i>						
Area Sources	0.88	0.00	0.01	0.00	0.00	0.00
Energy	0.09	0.86	0.72	0.01	0.07	0.07
Mobile Sources	17.40	38.49	162.14	0.26	18.63	5.35
<i>Total</i>	<i>18.37</i>	<i>39.35</i>	<i>162.87</i>	<i>0.27</i>	<i>18.70</i>	<i>5.42</i>
<b>Net Increase (Proposed)</b>	<b>10.90</b>	<b>8.13</b>	<b>29.22</b>	<b>0.18</b>	<b>11.81</b>	<b>3.23</b>

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**Table 1**  
**Estimated Maximum Daily Net Operational Emissions – Updated Project**

Emission Source	VOCs (lb/day)	NO <sub>x</sub> (lb/day)	CO (lb/day)	SO <sub>x</sub> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)
Project Minus Existing Base)						
<i>Emission Threshold</i>	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015.

Notes: See Appendix A, Supplemental Analysis Data, for detailed results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

lb/day = pounds per day; VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.

**Table 2**  
**Estimated Maximum Daily Net Operational Emissions – Updated Project Variant**

Emission Source	VOCs (lb/day)	NO <sub>x</sub> (lb/day)	CO (lb/day)	SO <sub>x</sub> (lb/day)	PM <sub>10</sub> (lb/day)	PM <sub>2.5</sub> (lb/day)
<i>Project Variant</i>						
Area Sources	6.62	0.00	0.07	0.00	0.00	0.00
Energy	0.07	0.65	0.55	0.01	0.05	0.05
Mobile Sources	14.56	33.84	138.65	0.32	22.15	6.24
<i>Total</i>	21.25	34.49	139.27	0.33	22.20	6.29
<i>Existing Variant</i>						
Area Sources	1.09	0.00	0.01	0.00	0.00	0.00
Energy	0.09	0.85	0.72	0.01	0.07	0.07
Mobile Sources	10.12	24.86	101.40	0.18	12.43	3.57
<i>Total</i>	11.30	25.71	102.13	0.19	12.50	3.64
<b>Net Increase (Project Variant Minus Existing Variant)</b>	<b>9.95</b>	<b>8.78</b>	<b>37.14</b>	<b>0.14</b>	<b>9.70</b>	<b>2.65</b>
<i>Emission Threshold</i>	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: SCAQMD 2015.

Note: See Appendix A for detailed results.

The values shown are the maximum summer or winter daily emissions results from CalEEMod.

lb/day = pounds per day; VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.

As shown in Tables 1 and 2, the criteria air pollutant emissions associated with the Updated Project and Updated Project Variant would remain less than significant with the addition of a third level of underground parking, increase in the total square footage of all proposed residential

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space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF and addition of 1,250 SF community room.

### **D Biological Resources**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to biology with the implementation of **MM-BIO-1** and **MM-BIO-2**.

The Updated Project would be required to implement **MM-BIO-1**, identified in the MND (February 2016) and Errata (April 2016), to prevent potential impacts to the movement of nesting or migratory birds that have the potential to use the on-site trees or street trees included for removal in the streetscape plan. The Updated Project would also be required to implement **MM-BIO-2**, identified in the MND (February 2016) and Errata (April 2016), to prevent potential impacts due to the loss of significant trees on site.

The Updated Project would result in the addition of one more level of underground parking, an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF and add a 1,250 SF community room. As with the Original Project, the Updated Project would not result in impacts relative to candidate, sensitive, or special-status species; riparian habitats, wetlands, or sensitive natural communities; wildlife movement; or habitat conservation plans. The Project Site is still in an urbanized area and contains little to no habitat. The Updated Project, like the Original Project, would not impact sensitive species or natural communities.

Like the Original Project, the Updated Project would have less than significant impacts relative to local policies protecting biological resources. The City of Los Angeles (City) and the communities of Pacific Palisades and Brentwood have numerous policies and design guidelines relative to street trees. While the landscaping and the trees on the Project Site would change upon implementation of the Updated Project, the proposed landscaping design and proposed new trees would be consistent with the applicable guidelines and would continue to comply with the Los Angeles Municipal Code.

Thus, with the incorporation of **MM-BIO-1** and **MM-BIO-2** as identified in the MND (February 2016) and Errata (April 2016), the Updated Project would not result in significant adverse biological impacts. This finding is consistent with the conclusion reached in the Errata (April 2016). There would be no changes to this issue area or any new impacts as a result of the addition of one more level of underground parking.

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## **E Cultural Resources**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to cultural resources with the incorporation of **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3**.

The Updated Project would be required to implement **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3**, identified in the MND (February 2016) and Errata (April 2016), to address potential impacts to unknown historic or archaeological resources that may be buried in and around Project Site during site grading for the Updated Project.

### **Paleontological Resources**

Although deep subsurface disturbance will occur during construction of the two-story subterranean parking structure proposed under the Original Project, as explained in the MND (February 2016) and Errata (April 2016), possible significant effects on paleontological resources would be mitigated to less than significant levels through implementation of **MM-CUL-1**. The Updated Project would also involve the disturbance of native soils during construction and would therefore require implementation of **MM-CUL-1**. **MM-CUL-1** would be equally effective in mitigating possible significant effects on paleontological resources to less than significant levels whether the excavation were for a two-story or a three-story underground garage. Therefore, just as with the Original Project, implementation of the Updated Project would not have a significant effect on paleontological resources with the implementation of **MM-CUL-1**.

### **Archaeological Resources – Unique Resource**

Although deep subsurface disturbance will occur during construction of the two-story subterranean parking structure proposed under the Original Project, as explained in the MND (February 2016) and Errata (April 2016), potential significant impacts to unique archaeological resources would be mitigated to less than significant levels through implementation of **MM-CUL-2**. The Updated Project would also involve the disturbance of native soils during construction and would therefore require implementation of **MM-CUL-2**. **MM-CUL-2** would be equally effective in mitigating possible significant effects on unique archaeological resources to less than significant levels whether the excavation were for a two-story or a three-story underground garage. Therefore, just as with the Original Project, implementation of the Updated Project would not have a significant effect on archaeological resources with the implementation of **MM-CUL-2**.

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As for the other changes to the Updated Project such as the addition of a 1,250 SF community room and an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF, there would be no changes in the impact levels to Cultural Resources.

### **Archaeological Resources – Human Remains**

Just as in the Original Project, excavations to construct the Updated Project would occur more than 0.25 miles from the closest recorded prehistoric archaeological site (CA-LAN-224). However, in areas of the Project Site where deep subsurface disturbance will occur, there is limited potential for encountering intact archaeological deposits that include human burials under both the Original Project and the Updated Project. **MM-CUL- 3** requires conformance with guidelines established by the CEQA Guidelines Section 15065.4 and the California Public Resources Code Sections 5097.97 and 5097.98 should human remains be encountered. **MM-CUL- 2** would be equally effective whether the excavation were for a two-story or a three-story parking garage. With the incorporation of this mitigation measures, residual impacts of the Updated Project (in either the Updated Project or the Project Variant scenario) to archaeological resources consisting of human remains would be less than significant. The other changes proposed in the Updated Project description, specifically the addition of a 1,250 SF community room and an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF would not affect or change impact levels to this issue area.

### **Historical Resources**

There continue to be no buildings on the Project Site found eligible for inclusion in, or as contributors to, a National Register of Historic Places or California Register of Historical Resources historic district. In addition, there are still no buildings that qualify as eligible for or contributing to a City Historic Preservation Overlay Zone. Therefore, like the Original Project, the Updated Project (in either the Proposed Project or Project Variant format) would not result in any significant impact to historical resources for the reasons stated in the MND (February 2016) and Errata (April 2016).

### **Conclusion**

Therefore, with the incorporation of **MM-CUL-1**, **MM-CUL-2**, and **MM-CUL-3**, as identified in the MND (February 2016) and Errata (April 2016), the Updated Project would not result in significant adverse cultural impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016). There would be no changes to this issue area or

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any new impacts as a result of the addition of one more level of underground parking, addition of a 1,250 SF community room an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF.

### **F Geology and Soils**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to geology and soils.

The analysis and conclusions contained in the MND (February 2016) and Errata (April 2016) were based on the geologic conditions within the footprint of the Original Project, which would not change with implementation of the Updated Project. Although the level of the parking garage would increase, the excavation assumptions remain the same. The MND (February 2016) and Errata (April 2016) were conservative in the excavation cubic yardage (122,000 cy) as the applicant had previously contemplated underground storage in this area. No additional excavation beyond the 122,000 cy already analyzed would be required to accommodate the third level of parking. Moreover, the borings completed as part of the geotechnical report went down as deep as 111.5 to 117.0 feet below the ground surface. Foundation, earthwork, and shoring/underpinning/retaining structure (including at-rest earth pressures) recommendations to address structural stability and seismic design are based on the geologic conditions encountered, which have not changed and thus remain applicable under the Updated Project scenario. As indicated in the MND (February 2016) and Errata (April 2016), these recommendations will be refined as necessary based on final designs and Los Angeles Department of Building and Safety review and approval, and incorporated into the Project's plans and specifications as a condition of final approval.

For these reasons, the addition of another underground parking level would not increase the impacts to geology and soils as presented in the Errata (April 2016). Moreover, the addition of a 1,250 SF community room an increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF would not in any way affect the analysis contained in the Errata (April 2016) and would not increase the severity or extent of impacts to geology and soils as presented in the Errata (April 2016).

### **G Greenhouse Gas Emissions**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant, adverse impacts related to greenhouse gases (GHGs) during construction or

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operations. The operational GHG emissions of the Updated Project (i.e., the mix of uses and square footages reflected in the Project Description section of the Errata (April 2016) with increased garage square footage to reflect the proposed third level of underground parking, increase in the total square footage of all proposed residential units from 10,000 SF to 17,500 SF and addition of a 1,250 SF community room. were remodeled using CalEEMod. The results are reflected in the tables that follow.

**Table 3**  
**Annual Net Operational Emissions – Updated Project**

	MT CO <sub>2</sub> /year	MT CH <sub>4</sub> /year	MT N <sub>2</sub> O/year	MT CO <sub>2</sub> E/year
<i>Proposed Project</i>				
Area	2.07	0	0	2.09
Energy (natural gas and electricity)	1,645.05	0.05	0.01	1,650.02
Mobile sources	5,090.14	0.21	0	5,094.44
Solid waste	13.68	0.81	0	30.66
Water supply and wastewater	98.09	0.44	0.01	110.58
Construction (amortized over 30 years)	48.92	0.01	0	49.03
<i>Total Proposed Project GHG Emissions</i>	<i>6,897.95</i>	<i>1.52</i>	<i>0.02</i>	<i>6,936.82</i>
<i>Existing Base</i>				
Area	0.00	0.00	0.00	0.00
Energy (natural gas and electricity)	582.99	0.02	0.01	585.04
Mobile sources	3,707.56	0.19	0.00	3,711.45
Solid waste	7.10	0.42	0.00	15.92
Water supply and wastewater	58.34	0.24	0.01	65.13
<i>Total Existing Base GHG Emissions</i>	<i>4,355.99</i>	<i>0.87</i>	<i>0.02</i>	<i>4,377.54</i>
<b>Total Net GHG Emissions</b>	<b>2,541.96</b>	<b>0.65</b>	<b>0.00</b>	<b>2,559.28</b>

MT = metric tons; CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>E = carbon dioxide equivalent; GHG = greenhouse gas. See Appendix A for detailed results. Notably, the solar panels were accounted for in CalEEMod as "mitigation," even though the rooftop solar is included in the Project design. In addition, 75% waste diversion consistent with Assembly Bill 341 was assumed for all scenarios. Thus, the "Mitigated" tables in the CalEEMod outputs represent the actual unmitigated scenarios.

**Table 4**  
**Annual Net Operational Emissions – Updated Project Variant**

	MT CO <sub>2</sub> /year	MT CH <sub>4</sub> /year	MT N <sub>2</sub> O/year	MT CO <sub>2</sub> E/year
<i>Project Variant</i>				
Area	0.02	0.00	0.00	0.02
Energy (natural gas and electricity)	1,185.33	0.04	0.01	1,188.88
Mobile sources	3,705.52	0.15	0.00	3,708.65
Solid waste	9.75	0.58	0.00	21.86
Water supply and wastewater	66.19	0.31	0.01	74.93
Construction (amortized over 30 years)	48.92	0.01	0.00	49.03

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**Table 4**  
**Annual Net Operational Emissions – Updated Project Variant**

	MT CO <sub>2</sub> /year	MT CH <sub>4</sub> /year	MT N <sub>2</sub> O/year	MT CO <sub>2</sub> E/year
<i>Total Project Variant GHG Emissions</i>	<i>5,015.73</i>	<i>1.09</i>	<i>0.02</i>	<i>5,043.37</i>
<i>Existing Variant</i>				
Area	0.00	0.00	0.00	0.00
Energy (natural gas and electricity)	577.88	0.02	0.01	579.90
Mobile sources	2,297.18	0.11	0.00	2,299.54
Solid waste	6.77	0.40	0.00	15.18
Water supply and wastewater	56.84	0.23	0.01	63.47
<i>Total Existing Variant GHG Emissions</i>	<i>2,938.67</i>	<i>0.76</i>	<i>0.01</i>	<i>2,958.09</i>
<b>Total Net GHG Emissions</b>	<b>2,077.06</b>	<b>0.33</b>	<b>0.00</b>	<b>2,085.28</b>

MT = metric tons; CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>E = carbon dioxide equivalent; GHG = greenhouse gas. See Appendix A for detailed results. Notably, the solar panels were accounted for in CalEEMod as “mitigation,” even though the rooftop solar is included in the Project design. In addition, 75% waste diversion consistent with Assembly Bill 341 was assumed for all scenarios. Thus, the “Mitigated” tables in the CalEEMod outputs represent the actual unmitigated scenarios.

As shown in Tables 3 and 4, the GHG emissions associated with the Updated Project (under the Updated Proposed Project and Updated Project Variant scenarios) would not exceed the applied South Coast Air Quality Management District draft threshold of 3,000 metric tons carbon dioxide equivalent (MT CO<sub>2</sub>E) per year and impacts would remain less than significant and consistent with the analysis in the previous documents given that the construction equipment and excavation factors have not changed.

### **H Hazards and Hazardous Materials**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to hazardous and hazardous materials with the implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4**.

The Updated Project would be required to implement **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4**, identified in the Errata (April 2016), to address potential impacts related to hazards or hazardous materials.

### **Hazards – Transport, Use, and Disposal of Hazardous Materials or Upset and Accident Conditions**

Just as with the construction the Original Project, demolition, grading, and construction activities for the Updated Project may involve the transport, storage, use, or disposal of some hazardous materials, such as on-site fueling and/or servicing of construction equipment. However, under

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either the Original Project or the Updated Project scenario, such activities would be short term and would not result in permanent transport, storage, or use of hazardous materials and substances. During operation, the Updated Project would also not involve the use or storage of hazardous materials or substances other than the small amounts of pesticides, fertilizers, and cleaning agents required for normal maintenance of buildings, landscaping, and business operations. Such activities during construction and operation would continue to be subject to federal, state, and local health and safety requirements. Additionally, to the same extent as incorporated into the Original Project, the Updated Project would incorporate **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4** as outlined in the MND (February 2016) and Errata (April 2016). Therefore, construction and operation of the Updated Project (whether the Proposed Project or the Project Variant scenario) would not result in significant impacts associated with the transport, use, and disposal of hazardous materials or significant impacts resulting from upset or accident conditions.

### **Hazards – Public Airport/Private Airstrip**

The location of the Project Site will not change under the Updated Project, and will not be located within 2 miles of an airport or an airport land use plan, or in the vicinity of a private airstrip. Therefore, like the Original Project, no Project-specific impacts would result from the Updated Project with regard to public airport or private airstrip impacts.

### **Hazards – Emergency Response Plan/Emergency Evacuation Plan**

The Project Site for the Updated Project is still located in the Pacific Palisades area. Just as under the Original Project, construction activities that require the temporary closure of lanes on Sunset Boulevard may affect emergency response and evacuation plans in the Pacific Palisades area through temporarily restricting travel along Sunset Boulevard. However, like the Original Project and as discussed and analyzed in the MND (February 2016) and Errata (April 2016), the Updated Project would not interfere with emergency response or evacuation plans as long as at least one lane of traffic remains open along Sunset Boulevard and temporary lane closures and other traffic obstructions are removed to allow all lanes to be open for through traffic in the event of an emergency, as specified in **MM-TT-1** (see Section O, Transportation and Traffic, of the Errata (April 2016)). Therefore, through compliance with **MM-TT-1** and City requirements regarding emergency response and evacuation, the Updated Project would not result in significant impacts to emergency response and evacuation plans.

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## Hazards – Schools

The location of the Project Site will not change under the Updated Project and will continue to be located in the vicinity of a number of schools, as discussed in the MND (February 2016) and Errata (April 2016). During construction, debris would be hauled from the Project Site. During operation, the use of hazardous materials and substances at the Project Site would remain minimal, would involve small quantities, and would be associated with routine maintenance, cleaning, and landscaping activities. Like the Original Project, should hazardous material be released to the air during construction or operation of the Updated Project, children attending the nearby schools could be affected, and as discussed in the MND (February 2016) and Errata (April 2016), this would be a potentially significant impact of the Updated Project, unless mitigated.

Just as under the Original Project, the use, storage, and disposal of hazardous materials and substances in the vicinity of schools during construction of the Updated Project would be subject to ongoing Department of Toxic Substances Control oversight and compliance with federal, state, and local health and safety requirements. These requirements include, without limitation, applicable Southern California Air Quality Management District air emission requirements and management practices associated with the release of dust and other particulate matter and the release of volatile organic compounds (VOCs). The Updated Project would be required to comply with the foregoing requirements, which would control emissions of hazardous materials, minimizing impacts to sensitive receptors, such as schools, in the vicinity of the Project Site. Additionally, implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4** would require emissions controls to further prevent potential impacts to nearby sensitive receptors during development of the Updated Project.

Like the Original Project, during operation of the Updated Project, the use of hazardous materials and substances at the Project Site would be minimal; would occur in small, commercially available quantities; would be associated with routine maintenance, cleaning, and landscaping activities; and would be subject to compliance with federal, state, and local health and safety and air quality requirements. As a result of the foregoing, impacts under the Updated Project would continue to be less than significant with the implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4**.

Therefore, like the Original Project, the potential for construction and operation at the Project Site to emit or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school is minimal under the Updated Project scenario. With the implementation of mitigation, the Updated Project would still not contribute to significant hazardous emissions impacts in the vicinity of schools.

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## Conclusion

With the incorporation of **MM-TT-1**, **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-HAZ-4** as identified in the MND (February 2016) and Errata (April 2016), the Updated Project would not result in significant adverse hazards and hazardous materials impacts. This finding is consistent with the conclusion reached in the Errata (April 2016). Accordingly, for the reasons set forth above, no changes are required for this issue area, nor are any new impacts identified as a result of the addition of one more level of underground parking increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to 17,500 SF and addition of a 1,250 SF community room.

## I Hydrology and Water Quality

The MND (February) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to hydrology and water with the incorporation of **MM-HYD-1**, **MM-HAZ-2**, and **MM-HAZ-3**.

An additional level of underground parking can be expected to potentially deepen the required excavations by 10–15 feet, which would still not approach the estimated depth of the static groundwater table, which ranges from 80 to 100 feet below the ground surface, however, as that the excavation of 122,000 cy of soil analyzed in the MND (February 2016) and Errata (April 2016) remain the same, no change in impact level will occur. The addition of one subterranean parking level, though it would remain above the static groundwater level, would increase the potential for excavations to encounter perched groundwater or seepage zones. However, **MM-HYD-1** would still apply and would be effective at ensuring that construction-related groundwater discharges would not violate waste discharge requirements or regional Water Quality Control Plan objectives. The increase in residentially proposed square footage and the addition of a 1,250 SF community room would not impact the hydrology and water quality for the Project. Analysis conducted in the MND (February 2016) and Errata (April 2016) is consistent with these minor project changes.

The addition of one more underground parking level would not change the required permits and approvals discussed in the Errata (April 2016), the applicability or effectiveness of proposed mitigation, or the extent of impervious surfaces or potential for altered storm water quality (as subsurface parking would not be exposed to rainfall).

Accordingly, the addition of another underground parking level, increase in the total square footage of all proposed residential space (while maintaining unit count at 8) from 10,000 SF to

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17,500 SF and addition of a 1,250 SF community room would not substantially increase the level of or extent of impacts to hydrology and water quality as presented in the MND (February 2016) and Errata (April 2016).

### **J Land Use Consistency and Compatibility**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not cause land use conflicts. The Updated Project, like the Original Project, proposes to redevelop the Project Site with demolition of the existing commercial uses and surface parking lots and the construction of new commercial and residential uses and open space in place of those existing uses. The Project Site is still located in an established area where commercial uses are already concentrated, and the Updated Project continues to propose a range of uses already existing in the PPCV district and permitted under the Specific Plan. The Updated Project would not involve features such as a highway, aboveground infrastructure, or an easement through an established neighborhood. Development of the Updated Project would still not result in a “spot” zone,<sup>1</sup> as the Project Site is surrounded by C2 zones to the south and west. The proposed commercial development on the Project Site would be consistent with the existing site uses and with the surrounding commercial uses to the south and west. The proposed multiple-family residential uses would continue to be consistent with the multiple-family residential uses that are adjacent to the northwest site boundary (the Project Variant would not include residential uses). As such, the proposed land uses for the Updated Project are generally consistent and compatible with the surrounding uses. Furthermore, like the Original Project, the structures that would be developed on the Project Site would be one to two stories in height, which is generally consistent with the existing building heights on the site and the heights of surrounding development in the area and within the Commercial Village Subarea. Like the Original Project, the floor area of the Updated Project, under both the Proposed Project and the Project Variant scenarios, is significantly less than the maximum density allowed under the PPCV Specific Plan.

Like the Original Project, upon implementation of the Updated Project, Swarthmore Avenue between the existing vehicular alley extending northwest–southwest through the site and Monument Street would be changed from a two-way street to a one-way street, with traffic flowing from Sunset Boulevard to Monument Street. This alteration would still not divide an established community, as it would not put a physical barrier in place. Vehicle traffic from the neighborhoods to the east of the Project Site would continue to be able to access Sunset

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<sup>1</sup> As defined in the City of Los Angeles CEQA Thresholds Guide, a spot zone occurs when the zoning or land use designation for only a portion of a block changes, or a single zone or land use designation becomes surrounded by more or less intensive land uses (City of Los Angeles 2006b).

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Boulevard via numerous other two-way roadways that provide connectivity between the neighborhoods to the east of the Project Site and Sunset Boulevard. As such, this proposed change in vehicular flow would still not divide an established community. Furthermore, upon implementation of the Updated Project, the existing vehicular alley, which is currently a one-way alley, would still be converted to a two-way alley. This would allow for increased access to the Project Site, as well as increased mobility through the Project Site. For these reasons, impacts would continue to be less than significant under the Updated Project.

As it would be under the Original Project, with the approval of the proposed PPCV Specific Plan amendment and zone change from R3P-1VL to C2-1VL, the Updated Project would be consistent with the General Plan land use designations currently applicable to the Project Site. The addition of one more level of underground parking would cause no adverse environmental effects that the General Plan and zoning ordinance are designed to avoid or mitigate. Therefore, the Updated Project would not result in significant adverse land use and planning impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016). There would be no changes to this issue area or any new impacts as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space. Accordingly, for the reasons set forth above, no changes are required to this issue area nor are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses (while maintaining the unit count at 8) and addition of a 1,250 SF community room space.

### **K Mineral Resources**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to mineral resources.

The Updated Project is still located in an area where urban development has already occurred, and the surrounding residential and commercial uses would likely preclude mining in the area. According to the Division of Oil, Gas, and Geothermal Resources, there is still no oil, gas, geothermal, or other known wells located in the Project area (DOGGR 2016). Similarly, the Project Site is still not located in an area of known significant mineral resource deposits (MRZ-2) as identified by the state geologist. The site and surrounding areas have been mapped by the state as an area containing mineral resource deposits, the significance of which cannot be evaluated from available data (MRZ-3) (Division of Mines and Geology 1994). As such, there are no known significant mineral resources on the Project Site. Just as under Original Project scenario, in the unlikely event that regionally important mineral resources were to be discovered on the Project Site, the surrounding commercial and residential land uses would likely preclude

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mineral resource extraction from occurring due to land use incompatibility. The nearest area designated as an MRZ-2 area is still located over 12 miles from the Project Site. Therefore, development of the Updated Project would not block access to an MRZ-2 area. As such, development of the Updated Project would not cause a loss in availability of a known mineral resource that would be of value to the region and the residents of the state.

Like the Original Project, no major oil drilling areas or oil fields shown in the City's oil resources map are located in the community of the Pacific Palisades, including the Project Site (City of Los Angeles 1996a, Figure GS-6, Oil Field and Oil Drilling Areas in the City of Los Angeles). There also are still no mineral resource areas or oil resources identified in the Brentwood–Pacific Palisades Community Plan or on the Community Plan Land Use Map (City of Los Angeles 2001, 2006a). Thus, development of the Updated Project would not cause a loss in availability of a known locally important mineral resource.

Therefore, the addition of one more level of underground parking would not result in significant adverse mineral resource impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016). Accordingly, for the reasons set forth above, no changes are required to this issue area or are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space.

### **L Noise and Vibration**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to noise with the incorporation of **MM-NOI-1, MM-NOI-2, MM-NOI-3, MM-NOI-4, MM-NOI-5, MM-NOI-6, MM-NOI-7, MM-NOI-8, and MM-NOI-9**.

The Updated Project would be required to implement **MM-NOI-1, MM-NOI-2, MM-NOI-3, MM-NOI-4, MM-NOI-5, MM-NOI-6, MM-NOI-7, MM-NOI-8, and MM-NOI-9** from the MND (February 2016) and Errata (April 2016), which would minimize the potential for all noise impacts to the same extent as such impacts would be mitigated under the Original Project as analyzed in the MND (February 2016) and Errata (April 2016).

Like the Original Project, the Updated Project includes an open green space. Monument Street abuts the eastern side of this proposed open space; therefore, noise exposure levels in the area would be primarily influenced by traffic volumes on this roadway. Like the Original Project, existing and proposed structures along the Sunset Boulevard frontage and Swarthmore Avenue

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frontage of the Project Site would continue to effectively shield the proposed open space from traffic-related noise generated by these two streets.

Under the Updated Project, the resulting future noise level in the open space would be the same as that in the Original Project. In addition, the calculated future noise level from 2023 buildout including noise contributions of the Updated Project would be the same as the Original Project.

The future noise levels within the closest usable portions of the open green space would not exceed the City's recommended maximum dBA noise exposure levels for neighborhood parks. Therefore, future noise exposure levels for the open green space would be in compliance with the Los Angeles Noise Element and impacts would be considered less than significant.

Like with the Original Project, the proposed open green space area would be composed of a grassy area suitable for passive recreational uses. Neither playground-style recreational structures nor sport courts or athletic fields are included in the proposed open green space. In the absence of components to support organized sports functions in the open green space, and given the modest size of the area (approximately 0.3 acres), the proposed open green space would still not generate noise levels that would exceed 60 A-weighted decibels community noise equivalent level (dBA CNEL) at the location of either proposed on-site apartments or residences located across Monument Street from the proposed open green space location. Therefore, future noise generation levels for the open green space would be in compliance with the Los Angeles Noise Element and impacts would be considered less than significant.

As with the Original Project, the Updated Project includes the same number of residential apartments (8 units), which would occupy the second level of a structure located on the southeast corner of Sunset Boulevard and Swarthmore Avenue. The addition of 7,500 SF of residential space to the Project would be allocated across the residential units and lobby without substantial changes or reconfigurations of the floor plans or the units. Hence, there is consistency with the previous analysis of floor plans indicating that proposed balcony areas for some of the apartments facing Swarthmore Avenue, and for other apartments facing Sunset Boulevard. These adjacent street segments would be the principal noise contributor to the noise environment in the future apartment balcony areas. The balconies are considered exterior living area, subject to the recommended exterior noise exposure levels for residential uses.

As with the Original Project, under the Updated Project, future noise exposure levels within the apartment balconies facing Swarthmore Avenue would range up to 60 dBA CNEL, which would be in compliance with the Los Angeles Noise Element target maximum criterion of 60 dBA CNEL for residential use exterior exposure. Future noise exposure levels within the apartment balconies facing Sunset Boulevard would range up to 70 dBA CNEL; the Noise Element

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indicates that noise exposure levels up to 70 dBA CNEL for residential uses are considered *conditionally acceptable*, where it is not feasible to achieve a lower level due to elevated traffic noise. The balconies facing Sunset Boulevard would continue to comply with the Noise Element.

The Updated Project would still be required to comply with LA General Plan Noise Element regarding exterior noise exposure and Title 24 of the California Code of Regulations regarding interior noise exposure.

As with the Original Project, the primary source of ground-borne vibration that would occur with the Updated Project would be construction activity. Proposed demolition and construction activities would be the same as the Original Project (although excavation of the subterranean parking garage would be longer in duration than under the Original Project) and would still not include blasting, pile driving, or use of a wrecking ball. Because the Project Site would not change under the Updated Project, the existing structures to be demolished would remain the same. Such existing structures are generally single-story wood-frame construction, which generally can be disassembled or demolished by means of handheld tools or standard equipment such as an excavator. Accordingly, the proposed demolition and construction activities on the Project Site would have little potential to expose nearby off-site residences to ground-borne vibration under the Updated Project. The closest residential structures to the Project construction area are still located approximately 120 feet away. Ground vibrations from general construction activities do not often reach levels that can damage structures or affect activities that are not vibration-sensitive, although the vibrations may be felt by people in close proximity and result in annoyance. Therefore, impacts would be less than significant were the Updated Project to be implemented.

The Updated Project, like the Original Project, would result in the addition of vehicle trips (increased average daily trips (ADT)) on the roadway network surrounding the Project Site. The largest ADT increases would occur on the roadways immediately adjacent to the Project Site; the increases would be smaller with greater distance from the Project Site due to trip distribution across a larger number of possible travel paths. For purposes of CEQA analysis, estimates of Project-generated vehicle trips are based on the type and volume (i.e., square footage) of Project uses (see Table 4.1 of the Errata (April 2016)). The Updated Project would not alter the type or volume of Project uses from those analyzed for traffic noise impacts in the MND (February 2016) and Errata (April 2016).

The MND (February 2016) and Errata (April 2016) concluded that the Original Project would result in less than significant increases in traffic noise exposure levels. Because the Updated Project would not add additional trips over the trips associated with the Original Project, the Updated Project would also result in less than significant increases in traffic noise exposure levels.

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With respect to permanent noise-generating characteristics, the assemblage of proposed commercial uses associated with the Updated Project would be the same as those proposed under the Original Project and both would be similar in nature and intensity to the existing on-site commercial uses to be replaced by the Project. Just as with the Original Project, the Updated Project would eliminate an existing gasoline service station and extensive surface parking lot, removing noise sources associated with vehicle fueling and parking lot activity (e.g., door and trunk closing, vehicle maneuvering in the parking area) (the existing gasoline station would not be removed under the Updated Project Variant scenario). The parking lot would be partially replaced (under either the Proposed Project or the Project Variant scenario) with a passive open green space area. The majority of activity associated with the space formerly occupied with a surface parking lot would be conducted indoors, limiting contributions to the ambient exterior noise environment. Although outdoor restaurant space is still proposed, dining is not considered an important source of noise generation would remain unchanged under the Updated Project. Consequently, noise levels associated with stationary noise sources for the Updated Project would remain less than significant.

The proposed open green space is anticipated to generate noise levels that are less than those associated with the parking lot that currently occupies this portion of the site. Therefore, future noise generation levels for the open space would continue to be in compliance with the City's Noise Element, and impacts would be considered less than significant under the Updated Project for the same reasons stated in the MND (February 2016) and Errata (April 2016) with respect to the Original Project.

As with the Original Project, implementation of the Updated Project would result in an increase in ambient noise levels during both construction and operation. Just as with the Original Project, construction noise associated with the Updated Project would result in a potentially significant short-term noise impact unless mitigated. However, **MM-NOI-2** through **MM-NOI-9** would be implemented in connection with the Updated Project such that temporary construction noise impacts would be mitigated to be less than significant, just as explained in the Errata (April 2016). When implemented in connection with the Updated Project, the combined effects of **MM-NOI-2** through **MM-NOI-6** are anticipated to reduce peak construction noise at the closest off-site sensitive receptors by a minimum of 5 dB equivalent sound level ( $L_{eq}$ ); the noise barrier required in **MM-NOI-7** would reduce peak construction noise at the closest off-site sensitive receptors by an additional 10 dB  $L_{eq}$ . Consequently, these mitigation measures would provide compliance with the Los Angeles Municipal Code (ordinance) restriction of 75 dBA  $L_{eq}$  for construction noise exposure in residential zones proximate to construction activity. In addition, the Updated Project would still be required to comply with Los Angeles Municipal Code Section 41.40 regarding construction schedule limitations to prevent nuisance noise impacts.

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As with the Original Project, the Updated Project Site is not included in an airport land use plan. The closest public airport to the Project Site is the Santa Monica Municipal Airport, which is a general aviation airport located 4 miles to the southeast of the Project Site. The Project Site is not located within the approach or departure zones for this airport; therefore, aircraft overflights would not affect the vicinity of the Project Site.

Therefore, with the incorporation of **MM-NOI-1, MM-NOI-2, MM-NOI-3, MM-NOI-4, MM-NOI-5, MM-NOI-6, MM-NOI-7, MM-NOI-8, and MM-NOI-9** as identified in the MND (February 2016) and Errata (April 2016) with respect to the Original Project, the Updated Project would not result in significant adverse noise and vibration impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016). Accordingly, for the reasons set forth above, no changes are required to this issue area, nor are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space.

### **M Population and Housing**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would result in no significant adverse impacts related to population and housing.

No housing units currently exist at the Project Site; therefore, the Updated Project, like the Original Project, would introduce eight new residential units to the Pacific Palisades. Like the Original Project, a population increase of approximately 20 to 25 people would result from implementation of the Updated Project. The minor increase in square will be allocated across the same number of units with no increase in the number of units. As analyzed in the MND (February 2016) and Errata (April 2016) an increase of approximately 20 to 25 new residents in Pacific Palisades would still represent a less than 0.1% population increase. In addition, the introduction of eight new households to the community would continue to represent a less than 0.1% household increase.

The existing commercial building floor area of approximately 51,850 square feet of commercial space at the Project Site would continue to be replaced by the Updated Project with 107, 465 square feet of commercial space consisting of retail, restaurant, grocery, movie theater, banking uses, office space, property manager office space and the additional 1,250 of community room space since it is analyzed as retail space for purposes of parking and traffic. The net increase in commercial area under the Updated Project would be approximately 55,615 square feet. Like with the Original Project, the net increases in commercial uses within the Pacific Palisades would result in a minor, incremental increase in the number of employment opportunities in the

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community. Increases in employment have the potential to result in population growth in the event that new employees move to the area. The same net increase of approximately 160 jobs would be created under the Updated Project scenario as would be created under the Original Project scenario. Because the Updated Project would continue to be located in the densely populated Los Angeles metropolitan area, it is anticipated that most of the jobs associated with the Updated Project would be filled by existing Pacific Palisades residents or by residents of neighboring communities and cities. As such, it is unlikely that the net increase in employment opportunities associated with the Updated Project would result in population growth in the Pacific Palisades.

Like with the Original Project, in the unlikely event that all new employees would move to the Pacific Palisades upon obtaining a job at the Project Site, the total population increase associated with the Updated Project would be approximately 160 people (including the increase associated with residential uses). The increase equates to approximately 0.7% growth. As such, in the unlikely event that the proposed commercial uses were to be associated with population growth in the Pacific Palisades, this growth would be minor.

As with the Original Project, the Updated Project would not require a General Plan amendment. In the unlikely event that all new employees would move to the Community Plan area, the population of the Community Plan area would still fall below General Plan Framework projections for 2020. As such, the Updated Project would not induce population growth within the Community Plan area that would be inconsistent with growth projections in the General Plan Framework Element. Furthermore, in the unlikely event that all employees were to relocate from outside the City into the City, the Updated Project would account for 0.15% of the projected growth for the City between 2013 and 2020. As such, the Updated Project would not meet the first screening criteria listed in the Los Angeles CEQA Thresholds Guide.

The Updated Project, like the Original Project, is located on a site that is currently developed with commercial uses and surface parking lots. The site is surrounded by commercial and residential development; as such, the Updated Project would not introduce development in an undeveloped area. Furthermore, because the Updated Project is located in an existing developed area, no extensions of major infrastructure are required or proposed. For these reasons, like the Original Project, the Updated Project would not induce substantial population growth. Furthermore, for the reasons discussed above, any minor population growth that would be associated with the Updated Project would fall within the General Plan population growth projections and within Southern California Association of Governments growth projections for the City. For these reasons, and just like the Original Project, the Updated Project would still not meet either of the two screening criteria identified in the Los Angeles CEQA Thresholds Guide, and impacts would continue to be less than significant.

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Like the Original Project, the Updated Project involves redevelopment of a site that is currently occupied by commercial land uses and surface parking lots. No housing units currently exist at the Project Site; therefore, like the Original Project, the Updated Project would not displace any existing housing necessitating the construction of replacement housing elsewhere.

Therefore, the proposed Updated Project would not result in significant adverse population and housing impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016) with respect to the Original Project. Accordingly, for the reasons set forth above, no changes are required to this issue area, nor are any new impacts identified as a result of the addition of one more level of underground parking increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space.

### **N Public Services, Recreation, and Parks**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to public services, recreation, and parks with the incorporation of **MM-PS-1**.

As with the Original Project, environmental impacts could result from the implementation of the Updated Project due to the location of the Project in an area having marginal police services. However, because the Updated Project would consist of substantially the same mix and volume of uses, it would not be expected to require additional police or other public safety resources over those required by the Original Project. Therefore, just as potentially significant impacts with respect to public services would be mitigated to a less than significant level through implementation of **MM-PS-1**, the same result would obtain for the Updated Project. **MM-PS-1** requires incorporation of design guidelines relative to access control, illumination of public spaces, security patrols, and other measures to reduce the likelihood of crime at the site. In accordance with **MM-PS-1**, the safety measures at the site would be approved by the Los Angeles Police Department prior to the issuance of building permits.

#### **Police Protection**

As with the Original Project, in order to decrease the effect of construction activities on response times, **MM-TT-1** (see Section O, Transportation and Traffic, of the MND (February 2016) and Errata (April 2016)) would be implemented as part of the Updated Project. **MM-TT-1** requires that a construction traffic control plan be drafted and implemented to facilitate traffic flow on the streets surrounding the Project Site and to maintain emergency vehicle access to the Project Site and neighboring land uses during construction activities.

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Implementation of the traffic control plan required by **MM-TT-1** would maintain emergency access to the Project Site and surrounding areas and reduce the potential effects of Project construction on response times. Upon implementation of a construction traffic management plan as required by **MM-TT-1**, construction impacts of the Updated Project on police protection would continue to be less than significant with mitigation incorporated.

Just as with the Original Project, the potential population increase from the Updated Project of approximately 20 to 25 residents resulting from the eight residential units even with the minor addition of 7,500 SF to the original 10,000 SF of residential space, while maintaining the unit count at 8 units would be minor relative to the current population of the Pacific Palisades, which is approximately 22,779 people (U.S. Census Bureau 2015). The estimate of the population increase resulting from the commercial land uses is conservative because it is anticipated that most of the jobs associated with the Updated Project would be filled by existing Pacific Palisades residents or by residents of neighboring communities and cities in the densely populated Los Angeles metropolitan area. Just as with the Original Project, it is not anticipated that the additional commercial spaces would lead to a substantial influx of residents to the Pacific Palisades. Additionally, in the event that the commercial spaces were to lead to an increase in residents, this increase would be minimal relative to existing population levels of Pacific Palisades.

Just as with the Original Project, emergency access to the Project Site and surrounding uses would be maintained at all times. Because the mix and volume of Project uses would not change under the Updated Project, the traffic generated by the Updated Project would, like the traffic from the Original Project, not significantly impact emergency vehicle response times to the Project Site, including along Los Angeles County-designated disaster routes (the closest of which are along Pacific Coast Highway, San Vicente Boulevard, and Topanga Canyon Boulevard (County of Los Angeles 2008)). The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, such that emergency vehicle response times are not typically impacted by minor increases in non-emergency vehicle traffic such as the traffic that would be generated by the Updated Project. Additionally, as detailed in Section 2.N.1(a) of the MND (February 2016) and Errata (April 2016), the commanding officer of the West Los Angeles Area Police Station would be provided with a diagram of the Updated Project once construction has been completed. The diagram would show access routes and would have any additional information to help facilitate police response. For these reasons, the Updated Project-related traffic is not anticipated to impair the Los Angeles Police Department in responding to emergencies at the Project Site or the surrounding area. Therefore, the Updated Project's

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potential impacts related to emergency response times would continue to be less than significant under the Updated Project scenario.

While the Updated Project may have an effect on police services, the Updated Project would incorporate security design features to promote crime prevention in accordance with **MM-PS-1**, and Caruso Affiliated (the Project Applicant) would provide the Los Angeles Police Department with a diagram of the site to help facilitate police response. For these reasons, the operational impacts of the Updated Project (under either the Proposed Project or the Project Variant scenario) to police protection would continue to be less than significant with mitigation.

### **Fire Protection and Emergency Medical Service**

The Project Site would remain unchanged with the Updated Project and would continue to be located within the required response distances for an engine and truck company, as a light force includes a truck and an engine. The Project Site is located in an urbanized area and is not in an area of inadequate fire hydrant service or street access.

The Project Site continues to be located in a Very High Fire Hazard Zone due to its proximity to the hilly and mountainous area of the nearby Santa Monica Mountains. However, the Project Site itself would still be located approximately 0.5 miles south of the foothills of the Santa Monica Mountains in a developed area, surrounded on all sides by commercial and residential development. The redevelopment of the Project Site with the Updated Project elements would result in a minor increase in the number of people present on the site who would be exposed to a wildland fire in the unlikely event that one were to occur on the Project Site. However, due to the existing urbanized nature of the Project Site and its surroundings, the development of the Updated Project would not result in a substantial change in the number of people exposed to wildfires and because the mix and volume of uses would be the same under the Updated Project as under the Original Project, the number of persons exposed to wildfires would not increase as compared to the Original Project.

In the unlikely event of a fire emergency on the Project Site, the Los Angeles Fire Department stations located within the Brentwood–Pacific Palisades Community Plan Area (17281, 15045, and 12229 Sunset Boulevard and 16500 Mulholland Drive) would continue to provide fire protection services. Due to the urbanized nature of the Project vicinity, the existing fire protection services available, and the minor increase in residents and visitors on the Project Site that would result from the Updated Project, impacts related to exposure of people and structures to wildland fire would be less than significant.

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The Project Site is located approximately 0.25 miles west of Fire Station 69. The Project Site is currently developed with commercial uses and is fully serviced by existing utilities. As such, the Project Site is served by existing hydrants and is not located within an area of inadequate fire hydrant service, as indicated on the Inadequate Fire Hydrant Service Area map for the City (City of Los Angeles 1996b). Furthermore, while the Updated Project would continue to result in an intensification of uses on the Project Site, both the existing and proposed uses fall within the category of “high-density residential and neighborhood commercial land uses” with respect to fire flow requirements. As such, because the fire flow land use category would not change, the existing hydrants and fire flows would continue to be adequate to meet the needs of the Updated Project. Additionally, the spacing, number, and fire flows of several existing hydrants were verified as meeting the requirements of the Fire Code. Compliance with Fire Code requirements would be further verified prior to issuance of building permits. Additionally, an automatic fire sprinkler system would still be installed inside the proposed commercial and residential structures.

Just as with the Original Project, construction of the Updated Project would require the use of small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. As such, construction may temporarily increase demand for fire protection services due to increased potential for exposure to hazardous materials, combustible materials, welding activities, and chemical reactions on the Project Site. However, in compliance with California Occupational Safety and Health Administration and Fire and Building Code requirements, construction managers and personnel would continue to be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would continue to be maintained on site. Additionally, the Updated Project construction would comply with applicable codes related to maintenance of mechanical equipment and handling and storage of hazardous materials. Like the Original Project, with compliance with applicable federal, state, and local codes relative to hazardous materials and construction safety and upon implementation of **MM-TT-1**, impacts to fire protection and emergency medical services during construction of the Updated Project would be less than significant with mitigation incorporated.

Like the Original Project, the Updated Project would not cause substantial population growth resulting in the need for new or expanded government facilities. The eight residential units that are part of the Proposed Project would be associated with approximately 20–25 additional residents in the Pacific Palisades, which is minimal relative to the population of the community (approximately 23,000 people at the time of the 2010 U.S. Census). Growth associated with the proposed commercial spaces on the Project Site would continue to be minimal due to the urbanized nature of the Project vicinity and the relatively minor net increase in commercial and office space. The design of the Updated Project would continue to comply with the provisions of the Fire Code, such as requirements for fire access, hydrant spacing, water pressure, and fire

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flows. Furthermore, emergency access to the Project Site and surrounding uses would be maintained at all times. Additional traffic generated by the Updated Project would not significantly impact emergency vehicle response times to the Project Site, including along Los Angeles County-designated disaster routes (the closest of which are along Pacific Coast Highway, San Vicente Boulevard, and Topanga Canyon Boulevard (County of Los Angeles 2008)). The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, such that emergency vehicle response times are not typically impacted by minor increases in non-emergency vehicle traffic such as the traffic that would be generated by the Updated Project. Due to compliance with the Fire Code and the minimal net increase in residential units and/or commercial and office square footage, impacts of the Updated Project would continue to be less than significant.

### **Public Schools**

Like the Original Project, the Updated Project would include eight residential units, which would slightly increase the residential population that is serviced by Los Angeles Unified School District in the Pacific Palisades. However, due to the minimal number of units and the minimal number of bedrooms in each proposed unit, these residences would continue to be associated with a minimal number of student-aged residents. Like with the Original Project, the residential component of the Updated Project would result in minimal to no increase in student population in the area schools. Additionally, Palisades Charter Elementary School and Revere Middle School continue to have seating overages and are projected to have seating overages 4 years from now (i.e., in 2020). As such, these schools would be able to accommodate the potential increase in students attributable to the Updated Project at full Project buildout (2017). For Palisades Charter High School, the projected enrollment in the attendance area is anticipated to increase. However, the Project enrollment continues to fall below the actual enrollment, indicating that the school will continue to be able to serve its attendance area and accommodate students from outside the attendance area. Furthermore, development impact fees may be levied for both residential and commercial construction, pursuant to Education Code Section 17620 and California Government Code Section 65995. As stated in Government Code Section 65996, payment of school impact fees in accordance with Government Code Section 65995 and/or Education Code Section 17620 continues to constitute full and complete mitigation for potential impacts to schools caused by development. As such, impacts related to the need for new school facilities as a result of implementing the Updated Project would be less than significant.

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## **Recreation and Parks**

While the City and the Brentwood–Pacific Palisades Community Plan area are deficient in parkland acreage, implementation of the Updated Project would not substantially exacerbate this deficiency. Like the Original Project, the Updated Project includes eight residential units, which would have the potential to result in approximately 20–25 new residents in the Pacific Palisades. The construction of such residential units would trigger City requirements for the payment of a “dwelling unit construction tax,” which would go into the City’s Park and Recreational Sites and Facilities Fund.

Just as with the Original Project, the commercial component of the Updated Project would also have the potential to indirectly generate additional residents in the Project vicinity, in the event that the employees of the commercial uses were to relocate to the community of Pacific Palisades. However, it is still anticipated that most of the jobs associated with the Updated Project would be filled by existing Pacific Palisades residents or by residents of neighboring communities and cities in the densely populated Los Angeles metropolitan area. As such, it is not anticipated that the additional commercial spaces would lead to a substantial influx of residents to the Pacific Palisades.

The potential 20–25 new residents at the Project Site and the visitors to the commercial uses of the Project would continue to be able to use the nearby neighborhood, community, and regional park resources described in the Existing Setting section of Section 2.N, Public Services, Recreation, and Parks, of the Errata (April 2016). Additionally, the Updated Project would still include a landscaped open space area for use by visitors and employees. The Project Site is still located within the service radius of a neighborhood park, a community park, and a regional park (City of Los Angeles 1996c). Furthermore, the Brentwood–Pacific Palisades Community Plan area still contains thousands of acres of open space associated with federal, state, county, and city-owned lands in the Santa Monica Mountains. These areas offer additional recreational space and recreational opportunities. The minimal population growth attributable to the Updated Project would not be of a magnitude that would substantially increase the use of these recreational facilities to the extent that physical deterioration of the facilities would be exacerbated. Additionally, the requirement to contribute to the City’s Park and Recreational Sites and Facilities Fund would further address any minimal increase in the use of recreational facilities resulting from the Updated Project. For these reasons, implementation of the Updated Project would continue to result in a less than significant impact with respect to this resource area.

Like the Original Project, the Updated Project would result in the redevelopment of an existing commercial site in an urbanized area. The redevelopment would include landscaping, including a landscaped open space area. All landscaped areas and walkways would continue to be developed on site and evaluated as part of the Updated Project. The Updated Project, like the Original

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Project, would result in minor increases in demand on the City's recreational resources and is not expected to result in the need for expanded facilities or new facilities. Therefore, implementation of the Updated Project would continue to result in a less than significant impact with respect to this resource area.

### **Libraries**

While employees and customers of the Updated Project could use the library services available at the Palisades Branch Library, located approximately 0.2 miles south of the Project Site, potential increases in use would still not be significant relative to existing community demand. The Palisades Branch Library is approximately 11,500 square feet in size (Los Angeles Times 2005). The Pacific Palisades had approximately 23,000 residents at the time of the 2010 U.S. Census. This size of facility would be suitable for a population of 35,000 people to 50,000 people. As such, according to the Los Angeles Public Library service ratio standards, the Palisades Branch Library continues to exceed the size requirements set forth by the Los Angeles Public Library. Therefore, this library is still considered adequate to meet the needs of the community and can also accommodate additional residents and visitors. For these reasons, Updated Project impacts would continue to be less than significant.

### **Conclusion**

Like the Original Project, with implementation of **MM-TT-1** and **MM-PS-1**, the Updated Project would not generate a need for new governmental facilities or services. Therefore, the proposed Updated Project would not result in significant adverse public services impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016) with respect to the Original Project. Accordingly, for the reasons set forth above, no changes are required to this issue area or are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space.

### **O Transportation and Traffic**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to transportation and traffic with the incorporation of **MM-TT-1**, **MM-TT-2**, **MM-TT-3**, **MM-TT-4**, **MM-TT-5**, **MM-TT-6**, and **MM-TT-7**.

The Updated Project would be required to implement **MM-TT-1**, **MM-TT-2**, **MM-TT-3**, **MM-TT-4**, **MM-TT-5**, **MM-TT-6**, and **MM-TT-7** from the MND (February 2016) and Errata (April

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2016), which would continue to mitigate potential transportation and traffic impacts to a level that is less than significant.

The proposed land uses in the Updated Project are substantially the same as the proposed land uses in the Original Project (i.e. commercial, residential, community room), as described in the Project Description section of the MND (February 2016) and Errata (April 2016), and for purposes of analyzing traffic impacts the proposed land uses in the Updated Project are equally or less impactful than the proposed land uses analyzed for traffic impacts in the MND (February 2016) and Errata (April 2016). The minor increases in the square footage and level of underground parking are not material differences with respect to traffic impacts. The addition of vehicle trips on the roadway network surrounding the Project Site would be the same under the Updated Project those analyzed in connection with the Original Project. Furthermore, the additional residential square footage does not increase the expected number trips, which are calculated on a per unit basis. Similarly, the community room square footage was already included as part of the retail square footage for purpose of modeling traffic impacts. All proposed roadway modifications contained in the Original Project are also contained in Updated Project, so the travel patterns and volumes analyzed in the connection with the Original Project would be the same if the Updated Project were implemented. The proposed square footage of parking and number of parking spaces would increase as a result of the construction of an additional level of underground parking. Including the new community room in the retail square footage, the Project would now have a total retail space of 54,665 square feet. The analysis conducted in the MND was conducted to conservatively analyze the community room as retail space, therefore the trips generated by the proposed community room were analyzed in the MND.

The Approved Traffic Study estimated a net additional total of 1,590 daily trips, -6 AM peak hour trips, and 132 PM peak hour trips. The Mobility Group prepared an estimate of trip generation to include the 1,250 square feet of community room, which was analyzed as retail space and as a result the Updated Project was found to generate 1,123 daily trips, -30 AM peak hour trips, and 95 PM peak hour trips. For all time periods, the Updated Project would generate fewer trips than the proposed land uses analyzed in the Approved Traffic Study. The additional residential square footage does not increase the expect trips, which are calculated on a per unit basis. Similarly, the community room square footage was already included as part of the retail square footage for modeling traffic impacts in the traffic study.

Because the mix and volumes of land uses in the Updated Project are not more impactful from those studied in the Approved Traffic Study; like the Original Project, the Updated Project would not cause any significant traffic impacts to Project Site intersection level of service (LOS) in either the AM or PM peak hour. In the AM peak hour, the addition of Project traffic from the

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Updated Project would be the same as that from the Original Project and would not cause the LOS to change at any of the study intersections. In the PM peak hour, the addition of the Updated Project traffic from the Updated Project would be the same as that from the Original Project and would cause the LOS to change at the Sunset Boulevard and Monument Street intersection from LOS B to LOS C; however, as with the Original Project, the increase in volume/capacity ratios at this intersection would be below the threshold of significance and no significant impact would occur.

Like the Original Project, the Updated Project would not cause any significant impacts to freeway operations or conflict with an applicable Congestion Management Plan. Impacts to freeway operations and Congestion Management Plans would be less than significant.

The Updated Project, like the Original Project, would not cause any significant transit impacts. In addition, the Updated Project would still be a mixed-use redevelopment project that would have no impact on air traffic patterns in terms of air traffic levels or routes.

As with the Original Project, access to the Updated Project Site would be provided along Swarthmore Avenue, Monument Street, and Sunset Boulevard. The Updated Project would continue to result in the conversion of Swarthmore Avenue from a two-way street into a one-way street from the alley just north of Sunset Boulevard to Monument Street. Vehicular access to the subterranean parking area would be via Swarthmore Avenue and Monument Street via a two-way alley running parallel to Sunset Boulevard in the same location as the current alley. Adequate sight distance would continue to be available at all access points, ensuring that exiting vehicles can see pedestrians on the sidewalk and vehicles on the surrounding roadways. As such, the Updated Project, like the Original Project, would have a less than significant impact with regard to increased traffic hazards.

As with the Original Project, emergency vehicle access to the Updated Project Site would be from the driveways along Sunset Boulevard, Monument Street, Swarthmore Boulevard, and the two-way alley running parallel to Sunset Boulevard in the same location as the current alley. Because the Updated Project would not cause significant intersection operation impacts, it would not affect existing emergency vehicle access. All Updated Project facilities would comply with applicable federal and state design standards. The Updated Project design plans would continue to be reviewed by the City for compliance with accessibility requirements and the City Fire Department would review the Updated Project design plans to ensure compliance with requirements for adequacy of emergency vehicle access. In addition, driveway delays associated with the Updated Project would be similar to those from the Original Project and would continue to be acceptable for the reasons outlined in the Errata (April 2016). Therefore, implementation of the Updated Project would have a less than significant impact on emergency access to the Project Site.

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Like the Original Project, the Updated Project would not conflict with adopted policies or involve modification of existing alternative transportation facilities located on or off site. Short-term bicycle racks would still be located at grade and long-term bicycle racks would be located in the first level below grade in the parking structure adjacent to vertical circulation for the commercial uses. The Updated Project would continue to provide increased pedestrian facilities over existing uses, and encourage walking and bicycle use in the community.

During construction of the Updated Project, Project traffic impacts would continue to be less than significant with the implementation of **MM-TT-1** through **MM-TT-7** as that the excavation of 122,000 cy of soil analyzed under the Project Description in the MND (February 2016) and Errata (April 2016) remains the same and therefore does not impact construction traffic or the haul route. Therefore, the proposed Updated Project would still not result in significant adverse transportation or traffic impacts. This finding is consistent with the conclusion reached in the MND (February 2016) and Errata (April 2016) with respect to the Original Project. Accordingly, for the reasons set forth above, no changes are required to this issue area or are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF of residential uses and addition of a 1,250 SF community room space.

### **P Utilities and Service Systems**

The MND (February 2016) and Errata (April 2016) concluded that the Original Project activities would not exceed applicable standards of significance and would not result in significant adverse impacts related to utilities and service systems.

As discussed in the MND (February 2016) and Errata (April 2016), the Updated Project would still connect to existing municipal utilities, including water, wastewater, and waste disposal services, as well as the municipal storm water system. As with the Original Project, building permits and development approvals will include water and sewer service connection permits and fees (which are used by utility districts to fund improvements needed to continue serving their service areas, ensure adequate capacity, and comply with the Los Angeles County Department of Health Services/State Water Resources Control Board water treatment requirements). As with the Original Project, development approvals for the Updated Project will not be granted unless the Applicant provides the City with utility will-serve (or availability) letters demonstrating the utility providers' intent to serve the Updated Project. Under either the Original Project or the Updated Project, storm water from the Project Site would be discharged to the City's storm drain system in compliance with applicable permits, including the regional Municipal Separate Storm Sewer System Permit for the Los Angeles Area (Order No. R4-2012-0175) and the City's storm water and runoff pollution control ordinance. An additional level of parking would not materially increase the demands on the above-described utilities and service systems. Accordingly, for the

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reasons set forth above, no changes are required to this issue area or are any new impacts identified as a result of the addition of one more level of underground parking, increase in 7,500 SF to residential uses and addition of a 1,250 SF community room space.

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