



SUSTAINABLE COMMUNITIES PROJECT CEQA EXEMPTION

2121 Westwood Boulevard Project Case Numbers: ENV-2020-5995-SCPE

Project Location: Street addresses associated with the Project Site include 2107 Westwood Boulevard, 2109 Westwood Boulevard, 2111 Westwood Boulevard, 2113 Westwood Boulevard, 2115 Westwood Boulevard, and 2121 Westwood Boulevard, Los Angeles, California, 90025. The Assessor's Parcel Numbers (APNs) for the Project Site 4322-001-015, 4322-001-016, and 4322-001-021.

Community Plan Area: West Los Angeles

Council District: 5 – Paul Koretz

Project Description: The Project Site consists of three (3) parcels located mid-block on the west side of Westwood Boulevard. Mississippi Avenue is located to the north and Olympic Boulevard is located to the south. Commercial uses currently exist along Westwood Boulevard on both sides and residential uses abut the property to the west. The Project proposes the demolition of four (4) vacant commercial buildings, one of which has a vacant second floor residential unit, and the development of an approximately 27,018 square-foot (0.62 acres) site with a mixed-use building containing approximately 92 new apartment units including 8 affordable units (8 Very Low Income). Included in this square footage would be a 776 square-foot recreation room, a 958 square-foot fitness center, and three retail spaces totaling 1,551 square feet. The Project would include approximately 7,740 square feet of open space, 125 vehicular parking spaces, 72 long-term bicycle parking spaces and 9 short-term bicycle parking spaces. The building would be five (5) stories over two subterranean garage levels and approximately 56' feet tall. The total floor area of the Project would be approximately 80,480 square feet, resulting in a Floor Area Ratio (FAR) of 3.0:1. The Project will provide 8 dwelling units as affordable units and thus utilize Affordable Housing Incentives for density, increased floor area, reduced open space, increased height, and request additional incentives for transitional height allowances and reduced side yard setbacks.

In order to permit development of the Project, the City would require approval of the following discretionary actions: (1) Pursuant to LAMC Section 16.05.C.1(b) Site Plan Review; (2) Director's Determination for a TOC project; (3) demolition, grading, excavation, and building permits; (4) haul route; and (5) other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. The Project also qualifies for Affordable Housing Incentives – Density Bonus pursuant to LAMC Section 12.22 A.25 with one on-menu incentive and four off-menu incentives, which allows a 35 percent bonus density with the inclusion of affordable housing. The Project relies on the following on-menu incentive: (1) a 20 percent open space reduction and the following off-menu incentives: (1) a FAR increase from 1.5:1 to 3.0:1; (2) an 11 foot building height increase; (3) a north and south side yard reduction from 8 feet to 5 feet; and (4) a waiver of transitional height requirement.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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APPLICANT:

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October 2021

Sustainable Communities Project CEQA Exemption

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Sustainable Communities Project CEQA Exemption

1. Project Description

a) Project Location

The Project Site is located in a highly developed urban neighborhood in the West Los Angeles Community Plan (“Community Plan”) area. Addresses associated with the Project Site include 2107 Westwood Boulevard, 2109 Westwood Boulevard, 2111 Westwood Boulevard, 2113 Westwood Boulevard, 2115 Westwood Boulevard, and 2121 Westwood Boulevard, Los Angeles, California, 90025. The Assessor’s Parcel Numbers (APNs) for the Project Site are 4322-001-015, 4322-001-016, and 4322-001-021. The Project Site consists of three (3) parcels located mid-block on the west side of Westwood Boulevard (“Project Site”). Mississippi Avenue is located to the north and Olympic Boulevard is located to the south. Commercial uses currently exist along Westwood Boulevard on both sides and residential uses abut the property to the west. The relatively flat Project Site is approximately 27,018 square feet (0.62 acres) in size.

Regional access to the area of the Project Site is provided by the San Diego Freeway (“I-405”) via Olympic Boulevard approximately 0.9 mile to the southwest and the Santa Monica Freeway (“I-10”) via Westwood Boulevard approximately 1.0 mile to the south. Local access to the Project Site is provided via Westwood Boulevard. The Los Angeles County Metropolitan Transportation Authority (Metro), Culver City Bus, and the City of Santa Monica Big Blue Bus (BBB) provide regional light rail and local bus service in the Project Site area. The intersection of the Metro Rapid 704 line and the BBB R12 bus at Westwood Boulevard and Santa Monica Boulevard, northwest of the Project, qualifies as a Major Transit Stop.¹ The Project Site is also located 0.8 mile from the Westwood/Rancho Park Expo Line Metro station at Westwood Boulevard and Exposition Boulevard. In addition, Santa Monica BBB and Culver City Bus both run bus lines along Westwood Boulevard and Olympic Boulevard.

b) Existing Conditions

The Project Site is relatively flat and currently developed with four vacant commercial uses, one of which has a vacant second floor residential unit, that occupy approximately

¹ A major transit stop is defined as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” (Public Resources Code (PRC) § 21064.3.)

11,657 square feet of floor area,² and two associated surface parking lots. Three of the commercial buildings are one-story and the fourth commercial building has a second-floor residential unit. Nearly the entire site is paved by concrete and asphalt except for planters located around the building parameters and two street trees located in front of 2107 Westwood Boulevard. Vehicular access to the Project Site is currently provided by three separate existing driveways on Westwood Boulevard.

The Project Site has a General Plan land use designation of Neighborhood Commercial under the West Los Angeles Community Plan Commercial, which has corresponding zones of C1, C1.5, C2, C4, P, RAS3, RAS4. The Neighborhood Commercial land use designation permits a range of corresponding commercial zones that allow for a variety of commercial and residential uses and intensities.

The Project Site is zoned C4-1VL-POD. Land uses allowed in the C4 zone include a wide range of commercial uses (including retail stores, restaurants/bars, offices, hotels, drug stores, grocery stores, etc.) as well as any residential land use allowed in the R4 zone (including multiple family dwellings with a minimum lot area of 400 square feet per dwelling unit).³ The Project Site is located in Height District No. 1VL, which restricts the height to 45 feet, three stories with a FAR of 1.5 to 1. The Project Site is also located within the Westwood/Pico Neighborhood Oriented District (POD). Projects located within the POD District require an Administrative Clearance from the Department of City Planning prior to issuance of a building permit, to ensure that projects meet certain standards for building frontages, parking, signs, and landscaping. While the Project Site is located within the POD District, it does not contain any qualifying non-residential uses and it does not meet the definition of a “project” under the POD and is therefore not regulated by the POD standards.

In addition, the Project Site is located within the West Los Angeles Transportation Improvement and Mitigation Area. The Project Site is located within a Bureau of Engineering designated Special Grading Area and will require a haul route. The Project Site is not located in a Historic Preservation Review or Overlay Zone. Further, the Project Site is not in a Hillside Area or subject to Hillside Construction Regulation and is not located in a Clean Up-Green Up (CUGU) area. The Project Site is located within an Urban Agriculture Incentive Zone, however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes.

The Project Site is not located within a Very High Fire Severity Zone, Flood Zone, Watercourse, Hazardous Waste zone, a High Wind Velocity zone, a Landslide area, Preliminary Fault Rupture Study Area, a Tsunami Inundation Zone, or a liquefaction zone;

² *City of Los Angeles Department of City Planning, Zone Information & Map Access System.*

³ *LAMC Section 12.16.A.*

but the Project Site is located within a Methane Buffer Zone and is located in a special grading area. The Project Site is located 0.56 mile from the Santa Monica Fault and is not located within an Alquist-Priolo zone.

The Project Site is not located within 500 feet of a school (Emerson Middle School is located approximately 4,752 feet north) and not located within 500 feet of a park or an Airport Hazard area. Fire protection service is provided by Fire Station 59, Battalion 9 of the Los Angeles Fire Department. Police services are provided by Reporting District 835, West Los Angeles Division, West Bureau of the Los Angeles Police Department.

Senate Bill (SB) 743 sets forth new guidelines for evaluating project transportation impacts under CEQA: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (“TPA”) shall not be considered significant impacts on the environment.” ((Public Resources Code (PRC) § 21099(d).). A “transit priority area” (TPA) is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” (PRC § 21099(a)(7).) A “major transit stop” is defined as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” (PRC § 21064.3.) An “employment center project” is defined as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. (PRC § 21099(a)(1).) “Infill Site” is defined as “a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.” (PRC § 21099(a)(4).) This State law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

The Project Site is located within a TPA pursuant to SB 743,⁴ and a City-verified Tier 2 Transit Oriented Communities (TOC) Affordable Housing Incentive Program Area as the Project Site is within a 2,640-foot radius of a Major Transit Stop as defined in Public Resources Code Section 21064.3.⁵ The intersection of the Metro Rapid 704 line and BBB R12 bus at Westwood Boulevard and Santa Monica Boulevard, northwest of the Project, qualifies as a Major Transit Stop. The City's Zoning Information File No. 2452 also identifies the Project Site as within a TPA.⁶ Other Zoning Information Files identify the Project Site as being located within the West Los Angeles Transportation Improvement and Mitigation Area.⁷

The City's Mobility Plan 2035 classifies Westwood Boulevard as Avenue II. Olympic Boulevard, located approximately 340 feet south of the Project Site, is classified as a Boulevard II.

c) Surrounding Land Uses

The Project Site is located within an urbanized setting in the West Los Angeles community of the City of Los Angeles. Property in the surrounding area is characterized by a mix of single- and multi-family residential and commercial uses. Specifically, properties immediately to the west, immediately adjoining the Project Site, are zoned R1-1 and are improved with single-family residences. Properties to the north, immediately adjoining the Project Site, are zoned C4-1VL-POD and improved with commercial uses, though one property immediately north of the Project Site appears to be a residential structure on commercially zoned property. Properties to the east, across Westwood Boulevard, are zoned C4-1VL-POD and are improved with commercial uses. Properties to the south, immediately adjoining the Project Site, are zoned C4-1VL-POD and improved with commercial uses.

d) Project Overview

The Project would involve the demolition of approximately 11,657 square feet of commercial uses and surface parking lots to allow construction of an approximately

⁴ SB 743 made several changes to the California Environmental Quality Act (CEQA) and deems aesthetic and parking impacts less than significant as a matter of law for residential, mixed-use residential, or employment center projects on an infill site within a TPA.

⁵ City of Los Angeles Department of City Planning, Zone Information & Map Access System; and Department of City Planning Case Number PAR-2018-2995-TOC.

⁶ City of Los Angeles Department of City Planning, Zone Information & Map Access System.

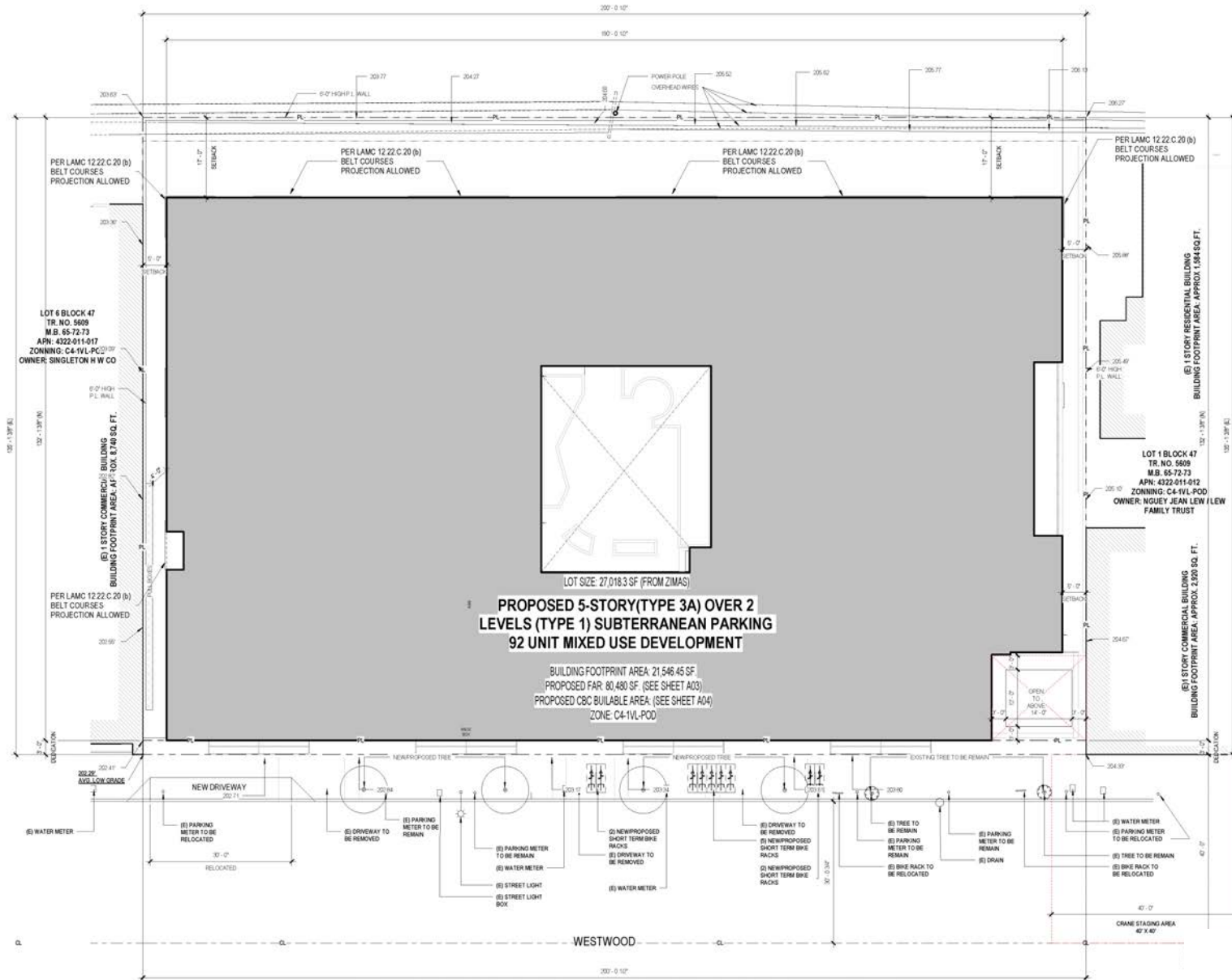
⁷ The West Los Angeles Transportation Improvement and Mitigation Specific Plan helps mitigate the cumulative impacts of development by requiring new development to contribute a fair share towards completing needed regional transportation improvements, in addition to completing required project specific mitigations. The Specific Plan assesses a one-time TIA fee on qualifying new development and identifies a comprehensive set of transportation improvements that are funded in part by the fee revenue.

80,480 square foot mixed-use project containing 92 new apartment units, including 8 affordable units set aside for 8 Very Low Income Households. Included in this square footage would be a 776 square-foot recreation room, a 958 square-foot fitness center, and three retail spaces totaling 1,551 square feet.

The Project would be comprised of a five-story building, approximately 56' feet in height, with two levels of subterranean parking. Refer to **Figure 1-1, Site Plan**, and **Table 1-1, Project Development Summary** for a summary of the Project.

**Table 1-1
Project Development Summary**

Land Use	Amount
<i>Residential Units (du)</i>	
Studio	17
One-Bedroom	62
Two-Bedroom	10
Three-Bedroom	3
Total Units	92 du
<i>Commercial Use</i>	
Commercial	1,551 sf
Total Commercial (sf)	1,551 sf
<i>Parking Spaces</i>	
Residential (Vehicle)	118
Commercial (Vehicle)	7
Total Vehicle Parking Spaces	125
Long-Term Residential (Bicycle)	70
Long-Term Commercial (Bicycle)	2
<i>Total Long-Term (Bicycle)</i>	72
Short-Term Residential (Bicycle)	7
Short-Term Commercial (Bicycle)	2
<i>Total Short-Term (Bicycle)</i>	9
Total Bicycle Parking Spaces	81
<i>Open Space (sf)</i>	
<i>Common Open Space</i>	
1 st Floor Courtyard	1,523 sf
Roof Deck	3,383 sf
Interior Open Space (Recreation Room and Fitness Center)	1,734 sf ^a
<i>Private Open Space</i>	
Balconies	1,100 sf
Total Open Space (sf)	7,740 sf
<i>du = dwelling units; sf = square feet</i>	
^a <i>Amenity spaces are only allowed to account for 25% of the required common open space. 7,740 x .25 = 1,935 sf. The fitness center and recreational room added together equal 1,734 square feet, which is below the allowable 1,935 square feet of open space calculations.</i>	
<i>Source: DE Architects, February 2021.</i>	



Source: DE Architects , July 2021.

Figure 1-1
Site Plan

The Project proposes a floor area ratio (FAR) of 3.0:1. The Project qualifies for Affordable Housing Incentives – Density Bonus pursuant to LAMC Section 12.22 A.25 with three menu incentives and three off-menu incentives, which allows a 35 percent bonus density with the inclusion of affordable housing. The Project relies on the following on-menu incentive: a 20 percent open space reduction and the following off-menu incentives: (1) an FAR increase from 1.5:1 to 3.0:1; (2) an 11 foot building height increase; (3) a north and south side yard reduction from 8 feet to 5 feet; and (4) a waiver of transitional height requirement.

(1) Design and Architecture

The Project's height, scale and massing has been designed to be compatible with surrounding existing development and consistent with the City's goals to place new density near transit options (refer to **Appendix L**). The Project's architecture has been designed and configured to reflect the manner in which residents live and interact with their neighboring community. Each side of the building contains windows, architectural vertical features, and balconies. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass. The top portion of the building, above the third floor, would step back at the rear of the building as measured from a 45 degree angle at the rear property line and step back at the front of the building as measured from a 45 degree angle starting at the building frontage at 45 feet in height, to diminish the perceived height from adjacent uses. Pedestrian entrances to common spaces and residential levels are oriented toward the street and public right of way.

In accordance with the Citywide Design Guidelines, the building provides a variety of architectural materials and building planes while creating a pedestrian-scaled project at the street level with glass, varietal materials and several vibrant colors. The fitness center, recreational room, business center, and all entrances on the ground floor are finished with glass, differentiating the lower façade from the articulated balconies of the apartments above. The glass provides a change in material and additional transparency at the pedestrian level to promote public safety and to add interest for the ground-floor viewer. Those portions of the ground floor that are not composed of glass are wrapped with a neutral sand finish cement plaster. This area is differentiated from the upper floors which contain balconies and windows, providing articulation and breaks in plane.

(2) Open Space and Landscaping

The Project's required open space was calculated pursuant to LAMC Section 12.21.G, based on the size and number of dwelling units. As shown on the **Table 1-1, Project Development Summary**, the Project proposes 92 housing units. For each unit with less than three habitable rooms, 100 square feet of open space is required, for each unit with

three habitable rooms, 125 square feet of open space is required, and for each unit with more than three habitable rooms, 175 square feet of open space is required. Thus, a total of 9,675 square feet of open space is required for this Project.⁸ As a Density Bonus Incentive, the Project Applicant is requesting a 20 percent reduction in open space requirement, which reduces the requirement to 7,740 square feet. As also shown on **Table 1-1, Project Development Summary**, the Project would provide approximately 7,740 square feet of open space. In addition, in conformance with LAMC Section 12.21.G, 25 percent of the provided common open space would be landscaped, or a minimum of 2,419 square feet.

The Project's open space and amenities would include a first-floor recreation room (776 square feet), fitness center (958 square feet), and courtyard and a roof deck courtyard with landscaping, BBQ areas, and seating. The first-floor open-to-sky courtyard would be located near the center of the building. A portion of the dwelling units, 22 units, would include private balconies.

There are two (2) existing street trees in the parkway adjacent to the Project Site. These trees are proposed to remain in place and the Project's landscape plan proposes four (4) additional street trees along Westwood Boulevard, pending Department of Urban Forestry approval.

(3) Access, Circulation, and Parking

Pedestrian access to the Project would be provided from the sidewalk along Westwood Boulevard, with access via an entry lobby. Vehicle access to the subterranean parking would be provided from Westwood Boulevard by a driveway on the southern end of the Project Site.

In accordance with the Density Bonus Parking Option 1, the Project is required to provide parking based on the number of bedrooms, inclusive of Handicapped and Guest parking with at least one space per one-bedroom units, and two parking spaces for units with two-three bedrooms. Based on the proposed unit mix, the Project would be required to provide 105 spaces for the 92 units. The Project meets and exceeds this requirement, providing a total of 125 spaces (26 compact spaces and 99 standard spaces) within the subterranean garage, including 7 reserved for the commercial uses. Up to 30 percent of all of the spaces would be equipped to be Electric Vehicle (EV) spaces and of those, 10 percent would be installed with Electric Vehicle Charging Stations (EVCS).

⁸ 17 studio units plus 62 one-bedroom units equals 79, which multiplied by the 100-square-foot requirement equals 7,900 square feet of required open space. 10 two-bedroom units multiplied by the 125-square-foot requirement equals 1,250 of required open space. 3 three-bedroom units multiplied by the 175-square-foot requirement equals 525 of required open space. 7,900 plus 1,250 plus 525 equals 9,675 square feet of required open space.

The Project is required to provide 72 long-term bicycle parking spaces and nine short-term bicycle parking spaces for the Project. As shown on **Table 1-1, Project Development Summary**, the Project meets this requirement with a total of 81 bicycle parking spaces (72 long-term and nine short-term spaces). Bike parking spaces are located in two separate areas: one room is located within the P1 level of the garage. This room contains 100 square feet of workspace and 40 bike parking spaces. The ground floor also contains two bike parking rooms for a total of 40 bikes. The nine short-term bike parking spaces are proposed to be located in the public right-of-way along Westwood Boulevard.

(4) Lighting and Signage

New Project signage would be used for building identification, wayfinding, and security markings. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses in accordance with the Zoning Code. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties.

(5) Site Operation and Security

Given the residential uses on the Project Site, the Project would operate 24 hours per day. The Project would provide security features including, but not limited to, controlled access and video surveillance.

(6) Sustainability Features

As described in the in the Energy and Water Efficiency Compliance Report for the Project (refer to **Appendix A**), the Project is designed to exceed Title 24 by at least 15 percent. Each of the units will maximize the indoor environmental quality with the inclusion of energy star air conditioning with fresh air intake, natural cross ventilation, exhausting kitchen hood and fans, no VOC paints, natural flooring, and formaldehyde free cabinetry, counters and shelving. All bathroom and plumbing fixtures will be water-conserving fixtures. Overall energy efficiency will be maximized with energy star rated appliances, advanced lighting, dual glazed windows with low-e coating and energy efficient thermal building envelope.

In accordance with new CAL-Green requirements, the Project includes the required 15 percent of the total roof areas as solar-ready, with thermal hot water panels and collectors as part of the base building design. The proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water use. Overall water consumption will be minimized with the inclusion of water efficient appliances and fixtures throughout the development. As described in the in the Energy and Water Efficiency Compliance Report

for the Project, the Project would provide more than 25 percent reduction in water usage over regional average.

The Project would support fewer vehicle trips by locating 92 new housing units (and approximately 207 new residents⁹) in a neighborhood that is served by several bus lines including the Santa Monica BBB and Culver City Bus, which both run bus lines along Westwood Boulevard and Olympic Boulevard. The Project Site is also located 0.8 mile from the Westwood/Rancho Park Expo Line Metro station at Westwood Boulevard and Exposition Boulevard.

(7) Anticipated Construction Schedule

The Project would be constructed in approximately 28 months beginning in third quarter of 2021 with occupancy projected for the first quarter of 2024. Construction activities would include the demolition of the existing on-site structures and surface parking, grading, excavation, and building construction. The Project would require the net export of approximately 24,500 cubic yards of soil.

⁹ Based on rate of 2.25 persons per multi-family dwelling unit ($2.25 \times 92 = 207$). Source: City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, page 10.

2. Sustainable Communities Strategy Criteria

I. SUSTAINABLE COMMUNITIES STRATEGY CRITERIA		
	Yes	No
<p>Is the proposed project consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in an adopted Sustainable Community Strategy?</p> <p>Southern California Association of Governments' (SCAG) adopted Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) on September 3, 2020. The RTP/SCS is a long-range plan intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. For the first time, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The RTP/SCS provides an alternative to "business as usual" development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit.</p> <p>In the RTP/SCS, SCAG utilized a Scenario Planning Model (SPM) and categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban; compact; or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.¹⁰ The RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040. In 2012, the Project Site is designated as "Urban", the high-density land development category assessed in the RTP/SCS. In 2040, the Project Site is also designated as "Urban".¹¹</p> <p><i>Urban: These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.¹²</i></p> <p>The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, R&D, industrial, civic and open space. The Project is</p>	X	

¹⁰ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report, adopted September 2020, pages 44-45.

¹¹ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, Sustainable Communities Strategy (SCS) Background Documentation Appendix, Exhibit 13 Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion and Exhibit 14 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion. <https://scag.ca.gov/scag-scenario-planning-model>. This document is unavailable for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. Therefore, the Land Use Development Categories for this SCPE rely in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

¹² Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Technical Report, adopted September 2020, page 45.

I. SUSTAINABLE COMMUNITIES STRATEGY CRITERIA		
	Yes	No
<p>consistent with a range of place types within the Urban Land Use Development Category reaching into 2040, including <u>the Town Mixed Use and Town Residential Place Types</u>.</p> <p>As outlined in the 2020-2045 RTP/SCAG, Town Mixed Use Place Types contain a variety of uses and building types and are generally located in transit-oriented and walkable areas. Typical buildings are between 3 and 8 stories tall, with ground-floor retail space, and office and/or residences on the floors above and parking is usually structured above or below ground. The land use mix for Town Mixed Use areas is typically approximately 26 percent residential, 20 percent employment, 29 percent mixed use, and 25 percent open space/civic. The residential mix is 100 percent multi-family. The average total net Floor Area Ratio (FAR) is 1.9, floors range from 2-8 feet, and the gross density ranges from 25-70 employees per acre and 7-35 households per acre.¹³</p> <p>Town Residential Place Types are a dense residential neighborhoods interspersed with occasional retail areas. Residents tend to use transit, walking, and bicycling for transportation needs and has limited off-street parking. The land use mix for this place type is typically approximately 68 percent residential, 0 percent employment, 10 percent mixed use and 22 percent open space/civic. The residential mix is 53 percent multi-family and 47 percent townhome. The average total net FAR is 1.2, floors range from 2-8, and the gross density ranges from 0-25 employees per acre and 12-35 households per acre.¹⁴</p> <p>The Project Site is located within a highly urbanized setting of West Los Angeles community of Los Angeles and would therefore, be consistent with the Urban Land Use Development Category reaching into 2040 (refer to Appendix B of this document for a Land Use Map). The Project is an infill project that would provide multi-family residential units and commercial uses in an urbanized setting within proximity to transit as well as commercial and retail uses. The Project is approximately 96 percent residential, and approximately four percent non-residential. The Project would construct approximately 148 dwelling units per acre and will have a total net FAR of 3.0 to 1. Furthermore, the Project is well-served by local bus service (the intersection of the Metro Rapid 704 line and BBB R12 bus at Westwood Boulevard and Santa Monica Boulevard, northwest of the Project, qualifies as a Major Transit Stop) and is located within a High Quality Transit Area as defined by SCAG and a Transit Priority Area as defined by SB 743. Additionally, access to the Project Site is served by a well-connected street network. The Project would also provide 81 bicycle parking spaces to reduce vehicle dependency.</p> <p>Additionally, as outlined in Appendix C of this document, the Project is also generally consistent with the goals and policies in the RTP/SCS.</p>		
<p><i>If answered "No" to the above question, the Project does not qualify for CEQA Exemption or Streamlining under the Sustainable Communities Strategy.</i></p>		

¹³ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Appendix 1, adopted September 2020.

¹⁴ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Appendix 1, adopted September 2020.

II. TRANSIT PRIORITY PROJECT DEFINITION CRITERIA

To meet the definition of a Transit Priority Project (TPP), as defined by Public Resource Code (PRC) Section 21155(b), the proposed project must meet all of the following criteria:

	Yes	No
<p>Based on total building square footage, does the proposed project contains at least 50 percent residential use? The Project would involve the development of an approximately 27,018 square-foot site with an approximately 80,480 square foot mixed-use project containing approximately 92 new apartment units including 11 percent (or 8 dwelling units) of the total proposed residential units for Very Low Income Households. Included in this square footage would be an 776 square-foot recreation room, a 958 square-foot fitness center, and three retail spaces totaling 1,551 square feet. Accordingly, non-residential uses in the Project total 3,285 square feet, and residential uses total 77,195 square feet. Therefore, the Project is comprised of approximately 96 percent residential uses (77,195 square feet/80,480 square feet = 0.96), which is greater than 50 percent and therefore meets Criterion #2.</p> <p>And, if project contains between 26 percent and 50 percent of non-residential uses, would the Floor Area Ratio be greater than 0.75? The Project contains approximately four (4) percent non-residential uses, and proposes a 3.0:1 FAR. Therefore, the Project meets criterion #2.</p>	X	
<p>Would the proposed project include a minimum net density of at least 20 dwelling units per acre? The Project would develop 92 residential units on a lot comprising approximately 0.62 acre (27,018 square feet). The net density of the Project would be approximately 148.39 units per acre. The Project therefore meets Criterion #3.</p>	X	
<p>Is the project site located within one-half mile of either of the following which have been included in a Regional Transportation Plan (RTP)? (a) a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods (also includes major transit stops that are included in the applicable RTP); or, (b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.</p> <p>The Project Site is within a Transit Priority Area (TPA), as designated by the Zoning Administrator Information File #ZI-245,¹⁵ which are areas primarily around existing and planned transportation nodes designated in the RTP/SCS as defined by SCAG. SCAG defines an HQTA as “areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. While HQTAs account for only three percent of total land area in SCAG region, they are planned and projected to accommodate 51 percent of the region’s future household growth and 60 percent of the future employment growth.”¹⁶ The Project Site is located in a neighborhood that is served by several bus lines including BBB lines 7, 8, R7 and R12, Culver City Bus line CC3, which both run bus lines along Westwood Boulevard and Olympic Boulevard. The intersection of the Metro Rapid 704 line and the BBB R12 bus at Westwood Boulevard and Santa Monica Boulevard, less than 0.56 mile northwest of the Project Site, qualifies as a Major Transit Stop. The Project Site is also located 0.8 mile from the Westwood/Rancho Park Expo Line Metro station at Westwood Boulevard and Exposition Boulevard.</p>	X	

¹⁵ City of Los Angeles Department of City Planning, Zone Information & Map Access System.

¹⁶ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, adopted September 2020, page 123.

II. TRANSIT PRIORITY PROJECT DEFINITION CRITERIA

To meet the definition of a Transit Priority Project (TPP), as defined by Public Resource Code (PRC) Section 21155(b), the proposed project must meet all of the following criteria:

	Yes	No
<i>If answered "No" to any of the above questions, the Project does not meet the definition of a Transit Priority Project and does not qualify for a full CEQA exemption under PRC Section 21155.1.</i>		

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA

	Yes	No
To be considered a Sustainable Communities Project, the Transit Priority Project (TPP) must comply with all of the following environmental criteria, as defined by PRC Section 21155.1(a):		

(1) The TPP is adequately served by existing utilities and the project sponsor has paid, or has committed to pay, all applicable development fees.

The Project Site is currently served by existing utilities. The Los Angeles Department of Water and Power (LADWP) would provide water service to the Project and maintains water infrastructure to the Project Site. The water infrastructure in the vicinity of the Project Site includes an existing 8-inch line on Westwood Boulevard. The electrical distribution system is comprised of one overhead 4.8kV circuit that runs along the rear of the property line between Westwood Boulevard and Midvale Avenue. Per the Will Serve letter, received from LADWP (included as **Appendix D.1**), the estimated water usage and power requirement for the Project is part of the total growth forecast for the City and has been accounted for in the planned growth of the Los Angeles infrastructure system.¹⁷ If water main or infrastructure upgrades are required, the LAMC requires the Project Applicant to pay for such upgrades, which would be constructed by either the Project Applicant or LADWP. Three existing fire hydrants are located on streets around the Project Site: the southeastern corner of Mississippi Avenue and Westwood Boulevard, the southwestern corner of Mississippi Avenue and Westwood Boulevard, and the northeastern corner of Olympic Boulevard and Westwood Boulevard.¹⁸ The City's Bureau of Sanitation provides sewer service to the Project area. The sewer infrastructure in the vicinity of the Project Site includes an existing 8-inch line on Westwood Boulevard, which feeds into a 10-inch line on Westwood Boulevard before discharging into a 12-inch sewer line on Glendon Avenue Alley. The sewage from the existing 12-inch line feeds into an 18-inch line on Selby Avenue before discharging into a 21-inch line on Overland Avenue. Per the Will Serve letter, received from Los Angeles Bureau of Sanitation (included as **Appendix D.2**), based on current estimated flows, the sewer system should be able to accommodate the total flow of the Project. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point and if it is determined at that time that the public sewer lacks sufficient capacity, then the developer would be required to build sewer lines to a point in the sewer system with sufficient capacity.¹⁹ Sewage from the Project Site is conveyed via existing sewer infrastructure to the Hyperion Treatment Plant (HTP). Construction of the Project would include all necessary connections to adequately link the Project to the existing City water and sewer system. The proposed sizes and locations for the domestic water and fire water points of connection will be determined by the LADWP and City of Los Angeles Fire Department, respectively.

X

¹⁷ Written correspondence from City of Los Angeles, Department of Water and Power, Will Serve Letter, Charles C. Holloway, Manager of Environmental Planning and Assessment, September 2, 2020, found in **Appendix D** of this document.

¹⁸ Los Angeles Fire Department, ArcGIS City of Los Angeles Fire Hydrants.

¹⁹ Written correspondence from City of Los Angeles, Bureau of Sanitation, Will Serve Letter, Ali Poosti, Division Manager, Wastewater Engineering Services Division, June 29, 2020, found in **Appendix D** of this document.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
Due to the largely impervious existing Project Site conditions and the increase in the amount of landscaping and other pervious surfaces, the Project would not result in a significant increase in Project Site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the Project Site and directed towards existing storm drains in the vicinity. The Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible.		
<p>(2) The TPP site does not contain wetlands or riparian areas, does not have significant value as a wildlife habitat, and implementation of the project would not harm protected species. The TPP does not cause destruction or removal of any species protected by a local ordinance.</p> <p>The Project Site is currently occupied by four vacant commercial uses, one of which has a vacant second floor residential unit, that occupy approximately 11,657 square feet of floor area,²⁰ and two associated surface parking lots all within a heavily urbanized area of the City. The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The heavily urbanized portions of the City contain fewer natural areas.²¹ The Project Site and immediately surrounding area are not identified as a biological resource area. Moreover, the Project Site is not within a designated or proposed Significant Ecological Area.²²</p> <p>The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. There are no known locally designated natural communities at the Project Site. Furthermore, the Project Site is not located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State or federally listed species. No riparian or other sensitive habitats are located on or adjacent to the Project Site. Review of the National Wetlands Inventory identified no protected wetlands in the immediate Project Site area.²³ The Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Furthermore, nearly the entire Project Site is paved by concrete and asphalt except for planters located around the building parameters and two (2) street trees located along Westwood Boulevard in front of the 2107 address. There are no protected native trees as defined by Article 6, Sec. 46.01 of the LAMC.²⁴ Regardless, the two (2) mature street trees are proposed to remain in place and four (4) additional street trees would be planted in the public right-of-way as part of the Project. All planting of trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.</p>	X	

²⁰ City of Los Angeles Department of City Planning, Zone Information & Map Access System.

²¹ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-1 – C-2.

²² Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map.

²³ U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper.

²⁴ Westwood Boulevard Project – Tree Assessment & Arboricultural Inventory Memo, NOREAS Inc, November 20, 2020, found in **Appendix O** of this document.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
The existing two trees, located in the public right-of-way, could contain nests for migratory birds, which are protected under the Migratory Bird Treaty Act, or the MBTA Section 3503, 3503.5, and 3513 of the California Fish and Game Code. The MBTA prohibits taking of all birds and their active nests, including raptors and other migratory nongame birds. The Project is required to adhere to the MBTA and applicable federal and state laws as well as the California Fish and Game Code; as a result, the Project would not have any substantial adverse impact, directly or through habitat modifications, on any protected species.		
<p>(3) The TPP site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List).</p> <p>California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.</p> <p>A Phase I Environmental Site Assessment (ESA) was performed by Ami Adini Environmental Services, Inc., in January 2020 (this report is available in Appendix E). As part of the Phase I, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The records search included federal, State, and tribal environmental record sources, and supplemental and local sources. The Project Site was not identified in the regulatory database reports. A recent review of such databases show that there are no known hazardous sites associated with the Project Site as according to California Department of Toxic Substances Control's (DTSC) EnviroStor database, SWRCB's GeoTracker database, and DTSC's current "Cortese" list. Accordingly, the Project Site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List).</p>	X	
<p>(4) The TPP is subject to a preliminary endangerment assessment to determine the existence of any hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from the area.</p> <p>(a) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements;</p> <p>(b) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.</p> <p>Recognized environmental conditions (RECs) is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. A controlled REC is an REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historic REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.</p>	X	

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA

	Yes	No
<p>A Phase I ESA was performed by Ami Adini Environmental Services, Inc., in January 2020.²⁵ The purpose of the ESA is to identify any recognized environmental conditions (RECs) affecting the Project Site. An REC is the presence or likely presence or any hazardous substances or petroleum products on the property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into the structure, on the property or into the ground, groundwater, or surface water of the property.</p> <p>The ESA also categorizes RECs as controlled RECs and historical RECs. A controlled REC is an REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property restrictions, activity and use limitations, institutional controls, or engineering controls). A historic REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority. The ESA was performed in conformance with the scope and limitations of ASTM Practice E1527-13.</p> <p>The Phase I ESA concluded that there are no REC's, controlled RECs or historical RECs in connection with the Project Site.</p> <p>Adjoining and nearby properties include addresses listed in numerous environmental databases pertaining to hazardous materials. These hazardous waste generators and chemical storage facilities, which utilize hydrocarbon solvents and ignitable waste include the following:</p> <ul style="list-style-type: none"> • Westwood Auto Body, located at 2100 Westwood Boulevard: EDR Hist Auto, CERS Hazwaste, HAZMAT, CERS, RCRA-SQG, FINDS, ECHO, EMI, automotive repairs and small quantity generator; • China Boy Laundry, located at 2079 Westwood Boulevard: Drycleaners, RCRA-SQG, FINDS, ECHO, EMI, HAZNET, clothes presser and cleaner; • Dove Cleaners, located at 2041 Westwood Boulevard: EDR Hist Cleaner, clothes presser and cleaner; • BMW of Westwood, located at 2201 Westwood Boulevard: EDR Hist Auto, RCRA-SQG, SWEEPS UST, HIST UST, FINDS, ECHO, automotive repairs and former UST; and • Royce Cleaners, located at 10848 West Olympic Boulevard: Drycleaners, HAZMAT, RCRA-SQG, FINDS, EMI, EDR Hist Cleaner, clothes presser and cleaner. <p>The nearest UST found in the databases is 222 feet upgradient to the southeast of the Project Site at the C & K Self Serves #4 at 2180 Westwood Boulevard. There is no record of a petroleum release for this UST.</p>		

²⁵ Phase I Environmental Site Assessment, 2107-2121 Westwood Boulevard, Los Angeles, CA 90025 for Assessor's ID Numbers: 4322-001-015, 4322-001-016, and 4322-001-021, by Ami Adini Environmental Services, Inc, January 2020, found in **Appendix E** of this document.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA

	Yes	No
<p>The Phase I ESA found that no reported releases have occurred at any of the aforementioned properties. Based on the regulatory statuses, these surrounding sites are not expected to represent a significant environmental concern to the Project Site.</p> <p>The USEPA has enacted strict requirements on the use, handling, and disposal of asbestos-containing materials (ACM) under the Toxic Substances Control Act (TSCA). These regulations include the phase out of friable asbestos and ACM in new construction materials beginning in 1979. Thus, any building, structure, surface asphalt driveway or parking lot constructed prior to 1979 could potentially contain ACM. Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has a one milligram per square centimeter (mg/cm²) (5,000 microgram per gram (µg/g) or 0.5% by weight) or more of lead. The US Consumer Product Safety Commission (16 Code of Federal Regulations [CFR] 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978, such as those on the Project Site, are much more likely to have LBP. Due to the date of construction of the on-site structures, it is recommended that ACMs and LBP surveys be conducted prior to removal of structures.</p> <p>The Project Site, along with the County of Los Angeles, is located within Radon Zone 2 of the California Radon Map. Radon Zone 2 areas have a predicted average indoor radon screening level between 2.0 picocuries per liter (pCi/L) and 4.0 pCi/L, below the 4.0 pCi/L action level set by the United States Environmental Protection Agency (USEPA). However, site specific radon level vary greatly within the EPA radon zones and on-site radon measurements would need to be collected in order to determine the Project Site radon levels.</p> <p>A Site Methane Investigation Report was performed by Methane Specialists, in February 2020 (this report is available in Appendix F). The Project Site is located in a City-designated methane buffer zone. LAMC, Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. Site testing is required to determine the design concentration, unless the developer accepts the most stringent methane requirements (Level V). In this case, Project Site testing was required to document that a lower level of mitigation is justified. As such, shallow and multiple-depth gas probe testing were conducted in accordance with the Department of Building and Safety “Site Testing Standards for Methane” (P/BC 2002-101).</p> <p>Methane Specialists installed the required minimum of three shallow methane probes at a depth of four feet below the ground surface. The three shallow gas probes were drilled and installed, starting on February 6, 2020. Multiple-depth probe site testing was similarly conducted on February 6, 2020. The results of the shallow gas probe and the multiple-depth gas probe are provided in Appendix F to this document. The results indicate that one measurable level of methane was detected during the testing. The Project, therefore, falls under Design Level II (see Table 1B in Appendix F), with less than two inches of water-column gas pressure. Therefore, per the Methane Code Table 1B, no methane mitigation system would be required with development of the Project.</p>		

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
<p>In addition to the Phase I ESA, a Preliminary Endangerment Assessment (PEA) was prepared for the Project Site.²⁶ As previously stated, no RECs were identified on the Project Site. Current and historic business activities, including dry cleaning and fuel storage on nearby properties create off-site RECs, but there is no direct evidence of soil, vapor, or groundwater contamination beneath the Project Site.</p> <p>Therefore, the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regards to siting the Project on a known hazardous waste site. Accordingly, the Project Site is not located on any list of hazardous waste sites compiled pursuant to Section 65962.25 of Government Code (Cortese List). In conclusion, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.</p>		
<p>(5) The TPP would not have a significant impact on historical resources.</p> <p>Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the Project were to adversely affect a historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.</p> <p>As discussed in the Historical Resources Assessment for 2107-2121 Westwood Boulevard, prepared by Sapphos Environmental, Inc. on March 4, 2021 (available in Appendix H), the Project Site is located adjacent to the east of the identified Janss Westwood 1 Planning District. The potential planning district contains approximately 500 parcels and although the neighborhood has lost too much integrity to be eligible as a potential HPOZ, the district still conveys significant character-defining features of the early-20th-century residential development of the area including tree-lined streets, mature vegetation, an orthogonal grid, consistent setbacks and massing, original iron post streetlights, detached rear garages and driveways, and moderately-sized single-family residences that were constructed during the 1920s and 1930s.</p> <p>The Project Site is comprised of three parcels, Lots 2 and 3 (tied into one lot in 1983), 4, and 5, which comprise the Project Site, are part of Tract No. 5609 which was recorded in March 1923. There are currently four buildings on the Project Site. The remainder of the Project Site is currently developed with surface parking areas. The properties located at 2107–2121 Westwood Boulevard were improved with four buildings between 1928 and 1938 and have historically been used for retail including grocers, sporting goods, beauty salon, and liquor stores. Based upon research and analysis, the existing buildings located</p>	X	

²⁶ Preliminary Endangerment Assessment Report 2107-2121 Westwood Boulevard, Los Angeles, CA 90025 for Assessor's ID Numbers: 4322-001-015, 4322-001-016, and 4322-001-021, by Ami Adini Environmental Services, Inc, July 2020, found in **Appendix G** of this document.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
<p>at 2107–2121 Westwood Boulevard do not appear to be individually eligible for listing in the National Register, California Register, or for designation as an HCM. The existing buildings are not rare remaining or distinctive examples of commercial development within the West Los Angeles Community Plan area. The buildings, aside from 2115–17 Westwood Boulevard, are vernacular commercial buildings with no significant association with commercial trends in the area or the City. The subject property at 2115–17 Westwood Boulevard is a mixed-use building with minimal Art Deco details that was designed by architect Glenn C. McAlister. Although McAlister is considered a master architect for some of his work listed in the National Register, the property does not rise to the same level of quality of architectural design as his already listed work and is not a notable example of his skillset as a master architect. Additionally, the subject properties are not located within a potential HPOZ as the surrounding area does not convey a cohesive pattern of design or development. Therefore, the existing buildings are not a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. Therefore, the Project would not result in a substantial adverse change to historical resources pursuant to Section 15064.5(b) of the CEQA Guidelines.²⁷ Furthermore, the Project Site is not identified as an eligible resource by Survey LA, the City’s office historic resources survey;²⁸ or as a City Historic-Cultural Monument.²⁹</p> <p>Three Spanish Colonial Revival, one substantially altered, and one Minimal Traditional single-family residences abut the western edge of the Project Site. Currently the building located at 2107–09 Westwood Boulevard and the detached garage at 2115–17 Westwood Boulevard are adjacent to the western parcel boundary and within several feet of the residential buildings property lines along Midvale Avenue. The parcel that the Project Site is sited on is 135 feet deep from the property line along Westwood Boulevard to the rear property line at the western end. The Project’s proposed building would sit along the property line on Westwood Boulevard and is approximately 109 feet deep, creating an approximately 26-foot buffer between the proposed building and the potential planning district to the west. As two current buildings within the footprint of the parcels abut the property line to the west, the Project would create a larger buffer between the Project and the potential Janss Westwood 1 Planning District properties than currently exists on the site. Additionally, even though the Project’s proposed building would be five stories, the fourth and fifth stories on the rear (western) façade would be significantly stepped back, breaking up the massing and scale of the proposed building. No aspects of the Project would alter the setting, feeling, or association of the potential planning district as all work would be completed facing Westwood Boulevard with approximately 26 feet between the Project’s proposed building and the western end of the parcel.</p> <p>Because the buildings to be demolished are not historical resources pursuant to Section 15064.5(a) of the CEQA Guidelines, and the proposed project would not alter the setting, feeling, or association of a potential planning district, HPOZ, or any other historical resource, the Project would have no direct or indirect impacts on historical resources.</p>		
<p>(6) The TPP is not subject to any of the following:</p> <p>a. a wildland fire hazard;</p> <p>As a result of the Oakland Hills Fire of 1991, AB 337 was passed in 1992 requiring CAL FIRE to work with local governments to identify high fire hazard severity zones within local</p>	X	

²⁷ *Historical Resources Assessment for 2107-2121 Westwood Boulevard, by Sapphos Environmental, Inc., March 4, 2021, found in **Appendix H** of this document.*

²⁸ *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map.*

²⁹ *City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List.*

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
<p>responsibility areas throughout each county in the State. In response, the City first established the Very High Fire Hazard Severity Zone (VHFHSZ) in 1999. The VHFHSZ replaced the older “Mountain Fire District” and “Buffer Zone.” The VHFHSZ comprises most of the hilly and mountainous regions of the City. Additionally, the Project Site is not located in a very high fire hazard severity zone; the nearest very high fire severity zone is Topanga State Park located approximately 15.0 miles to the north.³⁰</p> <p>The State Responsibility Area (SRA) is the area in the State where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA is comprised of over 31 million acres across the entire State to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. Lands in the SRA are based on vegetative cover and natural resource values. The Project Site is located in a developed, urban area in the Community Plan area. The Project Site and surrounding area are relatively flat and do not contain any significant slope. The Project Site is not located in or near the State responsibility area.³¹</p> <p>b. an unusually high risk of fire or explosion from materials stored or used on nearby properties;</p> <p>A Phase I Environmental Site Assessment (ESA) was performed by Ami Adini Environmental Services, Inc., in January 2020 (this report is available in Appendix E). As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The records search included federal, State, and tribal environmental record sources, and supplemental and local sources. The Project Site was not identified in the regulatory database reports. A recent review of such databases show that there are no known hazardous sites associated with the Project Site, according to California Department of Toxic Substances Control’s (DTSC) EnviroStor database, SWRCB’s GeoTracker database, and DTSC’s current “Cortese” list. Therefore, the Project Site is not subject to an unusually high risk of fire or explosion from materials stored or used on nearby properties.</p> <p>Additionally, the Project Site is surrounded by commercial, retail, residential, and office land uses. These uses are also not typical operations associated with high risk of fire or explosions, such as industrial or warehousing facilities. According to the CalGEM map, the Project Site is located approximately 1,000 feet from an oil field.³² Due to the close proximity of significant oil production areas, the Project Site has been identified as being located in a City-designated methane buffer zone. As previously discussed, a Site Methane Investigation Report was performed by Methane Specialists, in February 2020 (this report is available in Appendix F). The Site Methane Investigation Report has determined that the Project Site falls under Design Level II (see Table 1B in Appendix F), with less than two inches of water-column gas pressure. Therefore, per the Methane Code Table 1B, no methane mitigation system would be required with development of the Project. Therefore, the Project Site is not subject to an unusually high risk of fire or explosion from materials stored or used on nearby properties.</p> <p>c. risk of a public health exposure at a level that would exceed federal and state standards;</p> <p>As discussed above, the Phase I ESA (this report is available in Appendix E) found no reported releases of hazardous materials have occurred from the surrounding properties or</p>		

³⁰ City of Los Angeles Fire Department, Fire Zone Map Viewer.

³¹ California Board of Forestry and Fire Protection, State Responsibility Area Viewer.

³² California Well Finder, CalGEM GIS.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
<p>the Project Site. However, as indicated in the Phase I ESA given the date of the on-site structures it is likely that ACMs are present. Therefore, prior to any demolition activities, an asbestos survey should be conducted. Based on the age of the on-site buildings, it is likely that LBP has been used on the existing structures to be demolished. Therefore, given that lead may be present within the existing on-site buildings a lead survey should be conducted of any suspect lead-containing materials (including paint) within the existing building that are likely to be demolished.</p> <p>The Project Site, along with the County of Los Angeles, is located within Radon Zone 2 of the California Radon Map. Radon Zone 2 areas have a predicted average indoor radon screening level between 2.0 picocuries per liter (pCi/L) and 4.0 pCi/L, below the 4.0 pCi/L action level set by the United States Environmental Protection Agency (USEPA). However, site specific radon level vary greatly within the EPA radon zones and on-site radon measurements would need to be collected in order to determine the Project Site radon levels.</p> <p>To further minimize risks associated with ACMs, a Project Commitment would be implemented that would require an investigation for ACMs be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s rule 1403, as well as other applicable City, State, and federal regulations, prior to renovation activities.</p> <p>In addition, a Project Commitment would be implemented and included as a condition of approval as part of the Project that would require that prior to demolition activities, an investigation for LBP would be conducted and any identified LBP would be abated in accordance with applicable City, State, and federal regulations.</p> <p>As such, the Project would not result in a risk of a public health exposure at a level that would exceed the standards established by any state or federal agency.</p> <p>d. seismic risk as a result of being within a designated earthquake fault zone or seismic hazard zone; and</p> <p>The Santa Monica fault is the nearest fault to the Project Site (0.56 mile). However, as indicated in the Geotechnical Engineering Exploration Letter (these findings are available in Appendix I), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, liquefaction zone, or a seismic hazard zone, which is based on correlation of a combination of factors including: surface distribution of soil deposits; physical relief; depth to historic high groundwater; shear strength of the soils; and occurrence of past seismic deformation.³³ Regardless, the Project would be required to comply with applicable state and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Engineering Exploration Letter that was prepared for the Project.³⁴ Conformance with current Building Code requirements and site-specific design recommendations in the Geotechnical Engineering Exploration letter would ensure that the Project would not expose people or structures to substantial adverse effects associated with seismic ground-shaking to any greater extent than other properties in the</p>		

³³ Preliminary Findings-Geotechnical Engineering Exploration for Proposed Apartment Building on Lots 3, 4, and 5, Block 47, Tract 5609, 2107-2121 Westwood Boulevard, Los Angeles, CA 90025, by Irvine Geotechnical Inc., February 2020, found in **Appendix I** of this document.

³⁴ Preliminary Findings-Geotechnical Engineering Exploration for Proposed Apartment Building on Lots 3, 4, and 5, Block 47, Tract 5609, 2107-2121 Westwood Boulevard, Los Angeles, CA 90025, by Irvine Geotechnical Inc., February 2020, found in **Appendix I** of this document.

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	Yes	No
<p>Southern California region. Impacts to seismic ground-shaking would be less than significant.</p> <p>e. landslide hazard, flood plain, flood way, or restricted zone.</p> <p>According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X – Area of Minimal Flood Hazard, which is a designation for areas determined to be outside the 100-year flood hazard area.³⁵ Thus, the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Further, the Project Site is not located with a potential inundation area. Additionally, there are no levees or dams in the Project vicinity. Therefore, no impact associated with flooding, including flooding due to the failure of a levee or dam, would occur.</p>		
<p>(7) The TPP site is not located on developed open space.</p> <p>The Project Site is located within a highly urbanized area that includes a mixture of low- to mid-rise buildings containing a variety of uses including commercial, retail, office, and residential uses. The Project Site is currently developed with four vacant commercial uses, one of which has a vacant second floor residential unit, and two associated surface parking lots with associated landscaping. The Project Site is designated for Neighborhood Commercial in the City of Los Angeles General Plan with corresponding zoning designation of C4-1VL-POD. The C4-1VL-POD zone permits a wide range of commercial uses (including retail stores, restaurants/bars, offices, hotels, drug stores, grocery stores, etc.) as well as any residential land use allowed in the R4 zone (including multiple family dwellings with a minimum lot area of 400 square feet per dwelling unit).</p> <p>Neither the City nor any other governmental entity has identified the Project Site as a park or open space. The Project Site currently does not contain any of the traditional aspects of developed open space, such as playgrounds, swimming pools, ballfields, enclosed child play areas, or picnic facilities. There are no building permit records which indicate that the Project Site has been developed with any recreational amenities or landscaping which is intended to be identified as open space.</p> <p>The City's Zoning Information and Map Access System (ZIMAS) identifies parks and other open space facilities using a number of symbols to denote the various types of facilities.³⁶ The Project Site is not identified with any symbol. Nor, is Project Site currently zoned as Open Space; it is not identified as having any park or recreational facility on ZIMAS; nor is it currently used for developed open spaces uses. Therefore, the Project Site is not located on a site with developed open space.</p>	X	
<p>(8) The TPP building would be 15 percent more energy efficient than Title 24 standards, and the TPP building and landscaping are designed to achieve 25 percent less water usage than the average household use in the region.</p> <p>The Project is designed to exceed Title 24 by at least 15 percent.³⁷ Each of the units will maximize the indoor environmental quality with the inclusion of energy star air conditioning with fresh air intake, natural cross ventilation, exhausting kitchen hood and fans, no VOC paints, natural flooring, and formaldehyde free cabinetry, counters and shelving. All bathroom and plumbing fixtures will be water-conserving fixtures. Overall energy efficiency</p>	X	

³⁵ Phase I Environmental Site Assessment, 2107-2121 Westwood Boulevard, Los Angeles, CA 90025 for Assessor's ID Numbers: 4322-001-015, 4322-001-016, and 4322-001-021, by Ami Adini Environmental Services, Inc, January 2020, found in **Appendix E** of this document.

³⁶ See ZIMAS Legend at <http://zimas.lacity.org/MapLegends/MasterLegend.pdf>.

³⁷ CEQA Exemption Energy and Water Efficiency Compliance, Westwood Apartments, 2121 Westwood Boulevard, Los Angeles, CA 90025, by Green Dinosaur, March 2021, refer to **Appendix A** of this document.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
<p>will be maximized with energy star rated appliances, advanced lighting, dual glazed windows with low-e coating and energy efficient thermal building envelope.</p> <p>As described in the Energy and Water Efficiency Compliance Report for the Project (refer to Appendix A), the Project has been designed to achieve 54.9 percent less water usage than the average household use in the region and would be 15.3 percent more energy efficient than Title 24 standards. In accordance with new CAL-Green requirements, the Project includes the required 15 percent of the total roof areas as solar-ready, with thermal hot water panels and collectors as part of the base building design. The proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water use. Overall water consumption will be minimized with the inclusion of water efficient appliances and fixtures throughout the development.</p> <p>Therefore, the Project would be designed to be 15 percent more energy efficient than the applicable Title 24 of the California Code of Regulations (CCR) standards and to achieve at least 25 percent less water usage than the average household use in the region.</p>		
To be considered a Sustainable Communities Project, the Transit Priority Project (TPP) must comply with all of the following land use criteria, as defined by PRC Section 21155.1(b):		
<p>(1) The TPP site is not more than 8 acres. The Project Site is approximately 27,018 square feet or 0.62 acres. Therefore, the Project Site is less than 8 acres.</p>	X	
<p>(2) The TPP would not contain more than 200 residential units. The Project involves the development of a transit-oriented development with 11 percent affordable housing containing 92 residential units. Included in the total 80,480 Project square footage would be an 776 square-foot recreation room, a 958 square-foot fitness center, and three retail spaces totaling 1,551 square feet. Therefore, the Project would not contain more than 200 residential units.</p>	X	
<p>(3) The TPP would not result in any net loss in the number of affordable housing within the project area. The Project Site is currently developed with four vacant commercial uses, one of which has a vacant second floor residential unit, and two associated surface parking lots with associated landscaping. The building permit records show that one residential unit that exists on the second story of the building which fronts along 2115-2117 S. Westwood Boulevard, was utilized by the previous owner as an office for approximately 10 years and it has not been occupied with a residential rental tenant for over 10 years. Regardless, this unit has been determined to exist as a residential multi-family use and is subject to the Rent Stabilization Ordinance as it was built before 1978. Please refer to the findings and justifications, and the HCIDLA Replacement Unit Determination HIMS # LA20-127289 for more information (refer to Appendix L). The Project would include 92 residential units, 11 percent of which would be affordable housing. Therefore, the Project would increase the number of affordable housing units within the Project area and would not displace existing affordable units.</p>	X	
<p>(4) The TPP does not include any single level building exceeding 75,000 square feet. The Project would be comprised of one five-story building, approximately 56' feet in height, with two levels of subterranean parking. Therefore, the Project does not include a single level building exceeding 75,000 square feet.</p>	X	
<p>(5) Applicable mitigation measures or performance standards in prior EIRs would be incorporated into the TPP. The SCAG RTP/SCS Mitigation Monitoring and Reporting Program (SCAG MMRP) does not include project level mitigation measures that would be required of the Project. The SCAG MMRP are mitigation measures that SCAG determined a lead agency can and</p>	X	

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	Yes	No
<p>should consider, as applicable and feasible, on a regional-scale and cumulative impacts of implementation of the RTP/SCS.³⁸ SCAG's measures are not specific to the Project, but nonetheless, the Project Measures required by the Project are consistent with those applicable measures suggested in SCAG's MMRP, detailed below. Refer to Appendix N, of this document, for a complete discussion of the Project's consistency with SCAG's MMRP. As noted therein, many of the mitigation measures identified by SCAG, beyond those discussed below, would not apply to the Project and, therefore, would not be incorporated into the TPP.</p> <p>The Project will also comply with the mitigation measures established in the Community Plan Update EIR, as discussed in Appendix N, of this document.</p>		
<p>(6) The TPP would not conflict with nearby operating industrial uses.</p> <p>The nearest industrial uses, which are comprised of storage yards and car repair uses, are located 0.4 mile southwest of the Project Site. The properties are zoned M2-1VL (Light Industrial) with a General Plan Land Use designation of Light Manufacturing.³⁹ Due to the distance of 0.4 mile, the Project is not expected to conflict or interfere with any of the existing operating industrial uses to the southwest. Therefore, implementation of the Project would not conflict or interfere with any of the existing nearby operating industrial uses comprised of storage yards and car repair uses.</p>	X	
<p>(7) The TPP is located within one-half mile of a rail transit station or a ferry terminal included in a RTP or within one-quarter mile of a high-quality transit corridor included in a RTP.</p> <p>The intersection of the Metro Rapid 704 line and the BBB R12 bus at Westwood Boulevard and Santa Monica Boulevard, northwest of the Project, qualifies as a Major Transit Stop, as defined in Public Resources Code Section 21064.3. The Project Site is also located 0.8 mile from a light rail transit station, the Westwood/Rancho Park Expo Line Metro station at Westwood Boulevard and Exposition Boulevard. In addition, the Project Site is served by several bus lines including BBB lines 7, 8, R7 and R12, Culver City Bus line CC3, which both run bus lines along Westwood Boulevard and Olympic Boulevard. As such, the Project Site is located near major bus transit routes with frequency of service interval of 15 minutes or less in the a.m. and p.m. peak commute periods (Appendix B: High Quality Transit Area). Therefore, the Project Site satisfies the CEQA exemption transit proximity requirement by being within a 2,640-foot radius of a Major Transit Stop.</p>	X	
<p>a. At least 20 percent of the housing would be sold to families of moderate income, or not less than 10 percent of the housing would be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income, and the TPP developer provides sufficient legal commitments as outlined in PRC Section 21555.1(c)(1)(B) to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households.</p> <p>b. The TPP developer would pay in-lieu fees sufficient to result in the development of an equivalent number of affordable units that would otherwise be required as outlined in the previous question.</p> <p>c. The TPP provides public open space equal to or greater than 5 acres per 1,000 residents of the project.</p> <p>In accordance with Option a., the Project would provide 92 housing units, of which 11 percent (or 8 dwelling units) of the total proposed residential units for Very Low Income</p>	X	

³⁸ Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy PEIR, adopted September 2020, Exhibit A Mitigation Monitoring and Reporting Program.

³⁹ City of Los Angeles Department of City Planning, Zone Information & Map Access System.

III. SUSTAINABLE COMMUNITIES PROJECT CRITERIA		
	Yes	No
Households. The estimated affordability breakdown based on Area Median Income (AMI) is shown below:		
Residential Building: 8 Very Low Income / 83 Market Rate Units / 1 Manager Unit = 92 units total		
<i>If "No" was checked to any of the above boxes, the TPP project is not a Sustainable Communities Project and does not qualify for a full CEQA exemption under PRC Section 21155.1. The TPP however, may qualify for CEQA streamlining under a Sustainable Communities Environmental Assessment or Limited EIR. (PRC Section 21155.2).</i>		