



City of Los Angeles

Department of City Planning • Major Projects/EIR Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY

VENICE COMMUNITY PLAN AREA

1209 6th Avenue

Case Number: ENV-2014-1988-EIR

Project Location: 1209 S. 6th Avenue, Los Angeles, CA 90291

Council District: 11 – Mike Bonin

Project Description: The proposed Project involves the subdivision and redevelopment of a small lot (e.g. Project Site) located in the Venice Community Plan Area and Venice Coastal Zone Specific Plan Area in the City of Los Angeles. Under the proposed Project, the existing 1,068 square foot vacant church located on the Project Site would be demolished. In addition, the Project Applicant is requesting a Parcel Map to permit the subdivision of the Project Site into two new small lots (e.g., Lot A and Lot B) to each be developed with one Small Lot detached single-family unit.

Both Small Lot single-family units would be three stories in height (29 feet tall) with a varied roof. Each small lot would be 2,502 square feet and developed with one Small Lot single-family unit, including three parking spaces (one covered and two uncovered spaces) a patio, and covered porch.

The Project Applicant is requesting: (1) A Parcel Map to permit the subdivision of the existing Project Site into two new small lots (pursuant to LAMC Section 17.50); (2) A Coastal Development Permit to allow for the demolition of the existing 1,068 square foot vacant church and the construction of two Small Lot single-family units in the single-jurisdiction coastal zone; (3) Demolition, grading, and building permits; (4) Haul Route approval; (5) Any additional actions as may be deemed necessary.

APPLICANT:
Rockport Development
1654 El Camino Street
Pomona, CA 91768

PREPARED BY:
Pareto Planning and
Environmental Services
1411 West Clark Avenue
Burbank, CA 91506

ON BEHALF OF:
City of Los Angeles
Department of City Planning
Major Projects/EIR
Analysis Section

October 2016

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Attachments

- Attachment A: City of Los Angeles ZIMAS property information database: zimas.lacity.org.
ZIMAS, Parcel Profile Report, 3/10/2016
- Attachment B: CalEEMod Air Quality Model Output, May 11, 2016
- Attachment C: Carlberg Associates, Horticulturists and Registered Consulting Arborists, RE:
1209 Sixth Avenue, Los Angeles California, March 28, 2015
- Attachment D: Geotechnical Engineering Investigation, Proposed Two-Story Single Family
Residence, Lot 1, Block Q, Ocean Park Villa Tract No. 2, 1209 S. 6th Avenue,
Venice, California, C.Y. Geotech, Inc., February 16, 2015
- Attachment E: SurveyLA, Venice Report, Individual Resources – 04/02/15, page 3 of 107,
1209 S 6th Avenue

I. INTRODUCTION

The subject of this Initial Study is the demolition of a 1,068 square foot vacant church, the subdivision and redevelopment of a small lot, and the construction of two detached Small Lot single-family units. The Project Site is located in the Venice Community Plan Area and Venice Coastal Zone Specific Plan Area of the City of Los Angeles. A full description of the Project is contained in Section 2 (Project Description). The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

PROJECT INFORMATION

Project Title: 1209 6th Avenue

Project Location: 1209 S. 6th Avenue¹
Los Angeles, CA 90291

Project Applicant: Rockport Development

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

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into four sections as follows:

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

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

Initial Study Checklist: This section contains the completed City of Los Angeles Initial Study Checklist.

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

¹ Additional addresses affiliated with the proposed Project include 566 East San Juan Avenue.

II. PROJECT DESCRIPTION

ENVIRONMENTAL SETTING

Project Location

The Project Site is located at 1209 S. 6th Avenue,¹ bounded by San Juan Avenue on the north, a single-family unit to the west, 6th Avenue to the east and San Juan Court to the south, in the Venice Community Plan Area within the Oakwood Sub-Area of the Venice Coastal Zone Specific Plan. (See **Figures 1 and 2, Regional Location and Project Location**). Multi-family and single-family residences are located to the north, south, east, and west of the Project Site. Commercial buildings are located along Abbot Kinney Boulevard, approximately 3 blocks south of the Project Site.

Regional access to the Project Site is provided via Pacific Coast Highway (PCH), approximately 0.5 miles east of the Project Site and via Interstate 10 Freeway (I-10), approximately 2 miles north of the Project Site. Abbot Kinney Boulevard and Venice Boulevard provide local access to the Site and are approximately 0.2 miles and 0.4 miles south of the Project Site, respectively.

Description of the Project Site and Existing Land Uses

The Project Site is approximately 0.12 acres and is developed with a 1,068 square foot vacant church. A chain link fence runs along the south and east property lines. A lawn provides a buffer between 6th Avenue and the existing structure. Four Jacaranda trees are located along the parkway. Chapter IV, Article 6 of the Los Angeles Municipal Code (LAMC), defines protected trees as:

Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree:

Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa), Southern California Black Walnut (Juglans californica var. californica), Western Sycamore (Platanus racemosa), and California Bay (Umbellularia californica).

¹ Additional addresses affiliated with the proposed Project include: 566 East Juan Avenue.

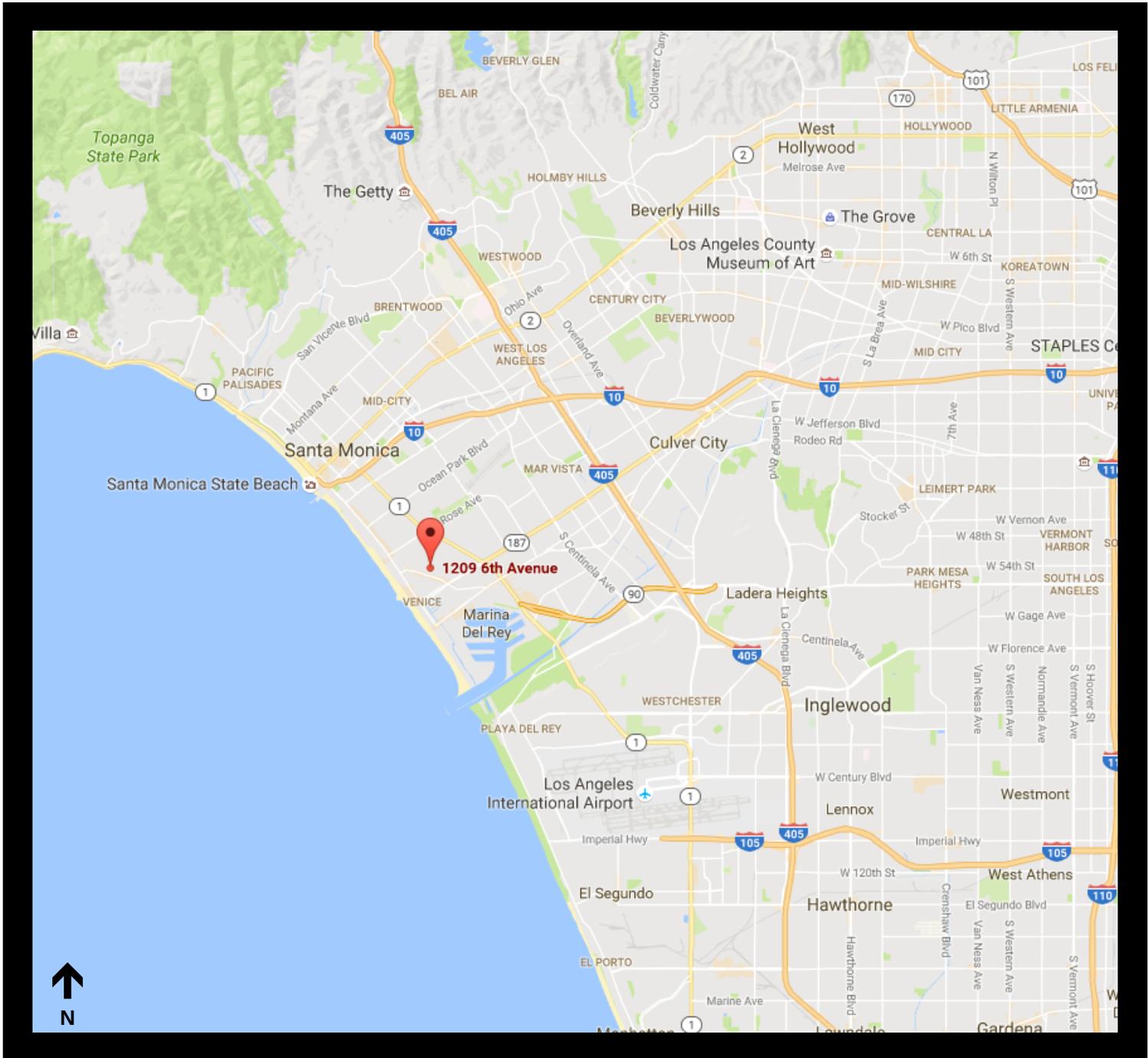


Figure 1 Regional Location

1209 6th Avenue Project
Source: Google Maps



Figure 2 Project Location

1209 6th Avenue Project

Source: County of Los Angeles Bureau of Land Management, Esri.

The four street trees are of common ornamental species; none of the trees are of a protected species as defined in LAMC Section 46.01. (See **Figures 3 and 4 Existing Project Site Conditions**). It is not known at this time if the street trees would be removed under the proposed Project. However, it is the City's Street Tree policy to require the replacement of any street trees removed during project construction. Specifically, the City's policy is to replace all significant, non-protected trees (defined as eight inches (8") in diameter at four and a half feet at a 1:1 ratio with a minimum 24-inch box size tree). Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Department of Public Works, Urban Forestry Division. The landscape plan shall demonstrate the minimum replacement ratio of 1:1 for the existing significant street trees (that would be removed) and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division, Department of Public Works.

Description of Surrounding Area

The Project Site is located on the northwest corner of S. 6th Avenue and San Juan Avenue in the Venice Community. The land uses in the general vicinity of the Project Site are characterized by a mix of multi and single-family units, which vary in building style and period of construction. To the immediate east of the Project Site (across 6th Avenue) are two one-story single-family units separated by a one-story garage. San Juan Court, located immediately to the south provides a buffer between the Project Site and additional one-story single-family units. One-story single-family units are located to the north (across San Juan Avenue), while a two-story single family unit abuts the west property line. Commercial uses are located along Abbot Kinney Boulevard approximately 0.2 miles south of the Project Site

Current Land Use and Zoning Designations

The Project Site is located within the Venice Community Plan Area, the Venice Local Coastal Zone Specific Plan Area, the Venice Local Coastal Program Land Use Plan, and the City of Los Angeles Coastal Transportation Corridor Specific Plan. The General Plan land use designation for the Project Site is Low Medium II Residential and the Site is zoned Restricted Density Multiple Dwelling (RD 1.5-1).



Figure 3 Existing Project Site Conditions

View of Project Site From Corner of San Juan Court and 6th Avenue (Looking Northwest)

1209 6th Avenue Project

Source: Google Earth



Figure 4 Existing Project Site Conditions

View of Project Site From Corner of San Juan Avenue and 6th Avenue (Looking Southwest)

1209 6th Avenue Project

Source: Google Earth

PROPOSED PROJECT CHARACTERISTICS

The proposed Project involves the subdivision and redevelopment of a small lot (e.g. Project Site) located in the Venice Community Plan Area and the Venice Coastal Zone Specific Plan Area in the City of Los Angeles. Under the proposed Project, the existing 1,068 square foot vacant church located on the Project Site would be demolished. In addition, the Project Applicant is requesting a Parcel Map to permit the subdivision of the Project Site into two new small lots (e.g., Lot A and Lot B) to each be developed with one detached Small Lot single-family unit.

Both Small Lot single-family units would be three stories in height (29 feet tall) with a varied roof. Each small lot would be 2,502 square feet and developed with one Small Lot single-family unit, including three parking spaces (one covered and two uncovered spaces), a patio, and covered porch. A pool would be located in the rear lot setback of the lot abutting San Juan Court (Lot B), while the front yard setback of the lot abutting San Juan Avenue (Lot A) would be landscaped. **Table 1, Proposed Project Components**, provides the square footage for each of the proposed Project's component.

Component	Square Footage
Small Lot Single-family unit	3,006
• first floor	771
• second floor	1,154
• third floor	1,081
Garage	213
Patio	178
Covered Porch	27
Total:	3,424
Source: Urban Planning Concept, 2016.	

A detailed description of the project components and architecture design is provided below.

Design and Architectural Features

The proposed Project's architectural design would be modern in character. The scale and massing would be consistent with the existing two-story housing units located in the vicinity of the Project Area. The two Small Lot single-family units would be constructed out of stucco with wood sided balconies and a large living area window facing onto S. 6th Avenue.

Small Lot Single-Family Units

Mid-block driveway access for both Small Lot single-family units would be provided via S. 6th Avenue. The two separate driveways would be located in the center of the parcel and would create a buffer between the two Small Lot single-family units, as shown in **Figure 5**. Both Small Lot single-family units would be three stories in height (29 feet tall) with a varied roof.

As shown in **Figure 6** through **Figure 9** the general layout of the two Small Lot single-family units would be similar. The ground floor of each Small Lot single-family home would consist of a kitchen area, dining room, living room, one bathroom and a storage area, while the second floor would include a master bedroom with a powder room including a bathroom and walk-in closet, a laundry room, entertainment room, and deck area. The third floor would include three bedrooms, two bathrooms, storage space and a deck area. As shown in **Figure 9**, both Small Lot single-family homes would also include a private roof deck area.

Recreation/Landscape

The 15-foot front yard setback area located along San Juan Avenue would be landscaped and provide a buffer between the Small Lot single-family unit constructed on the northern parcel (Lot A) and the street (refer to **Figure 10**). An approximately 7-foot wide by 20-foot long pool would be located in the 20-foot rear setback area along San Juan Court, adjacent to the Small Lot single-family unit located on the southern parcel (Lot B).

Both Small Lot single-family units would include three outside deck areas; a 143 square-foot deck on the second floor, a 35 square-foot deck on the third floor, and an approximately 366 square-foot deck on the roof.

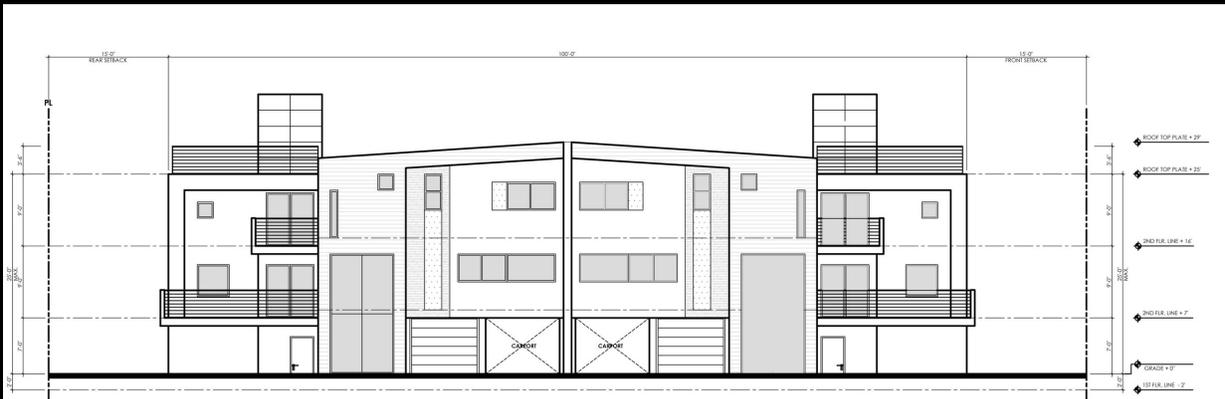
Parking

Each small lot would be 2,502 square feet and developed with one Small Lot single-family unit, including three parking spaces (one covered and two uncovered spaces), and is in compliance with the Venice Coastal Zone Specific Plan parking requirements.

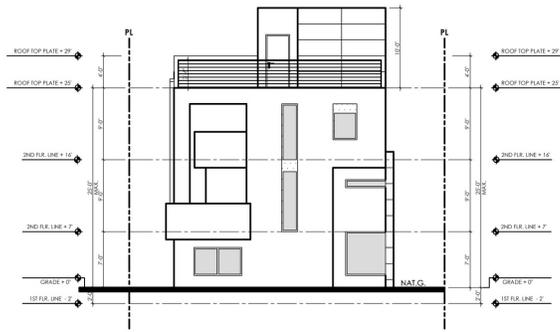
Compliance with Standard City Conditions of Approval

Project construction will be conducted in accordance with the following standard City conditions of approval for residential infill construction:

- Construction and demotion shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday;
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels; and,
- The project contractor shall be required to use power construction equipment with state-of-the-art noise shielding and muffling devices.



ELEVATION SCALE 3/16" = 1'-0" 1



ELEVATION SCALE 3/16" = 1'-0" 2

Figure 5 Project Elevation

1209 6th Avenue Project

Source: Urban Planning Concepts

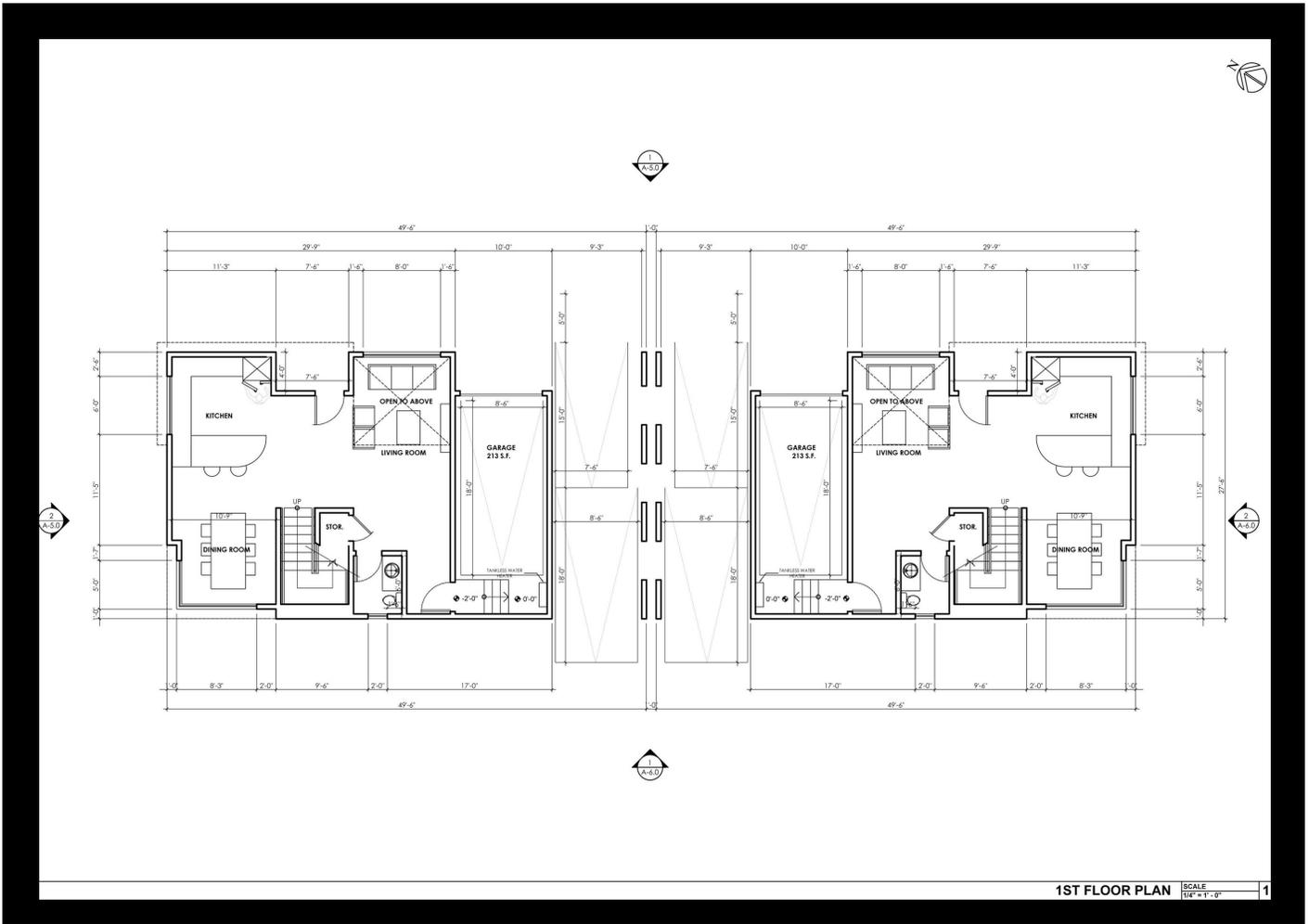


Figure 6 First Floor Plan

1209 6th Avenue Project

Source: Urban Planning Concepts

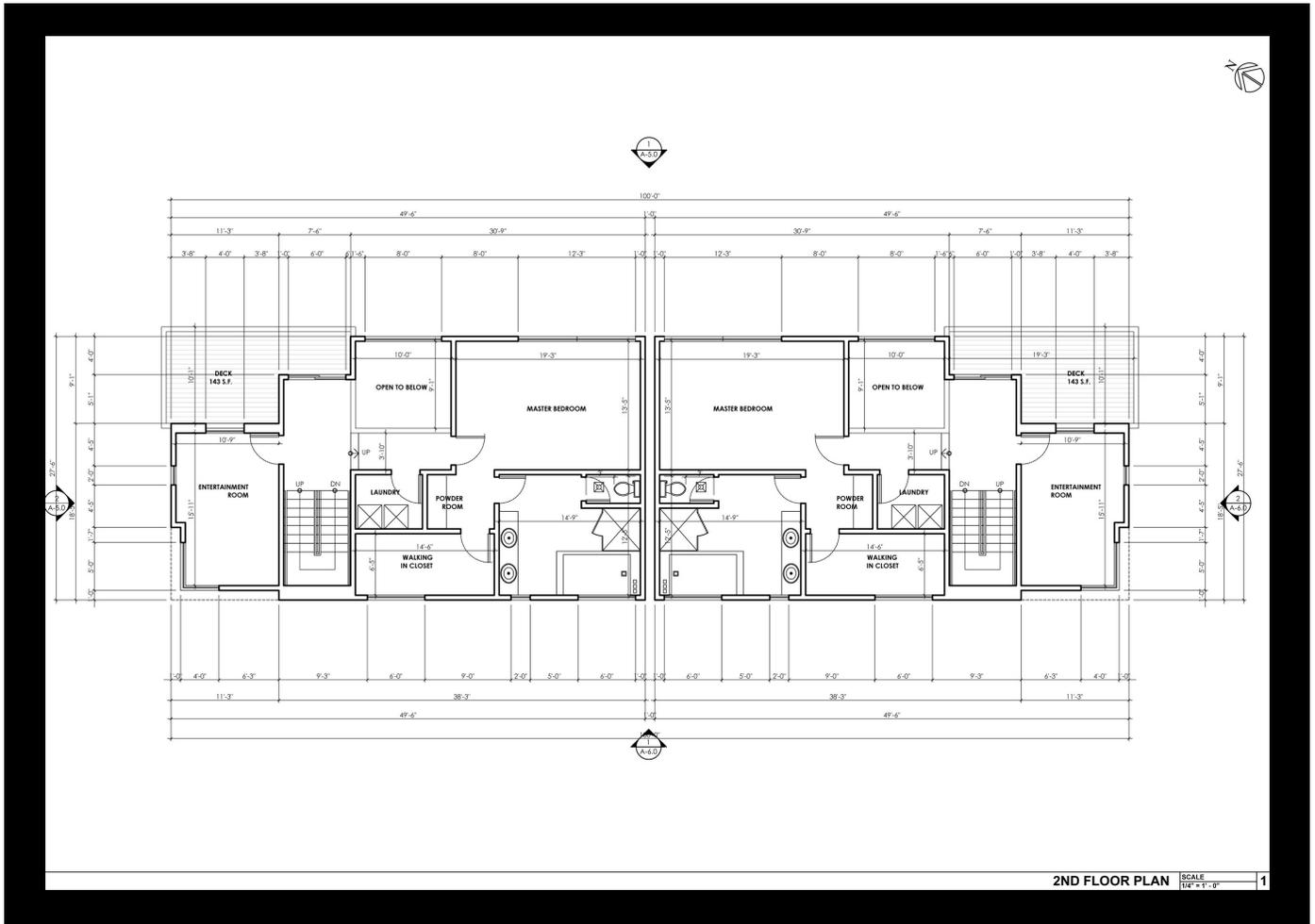
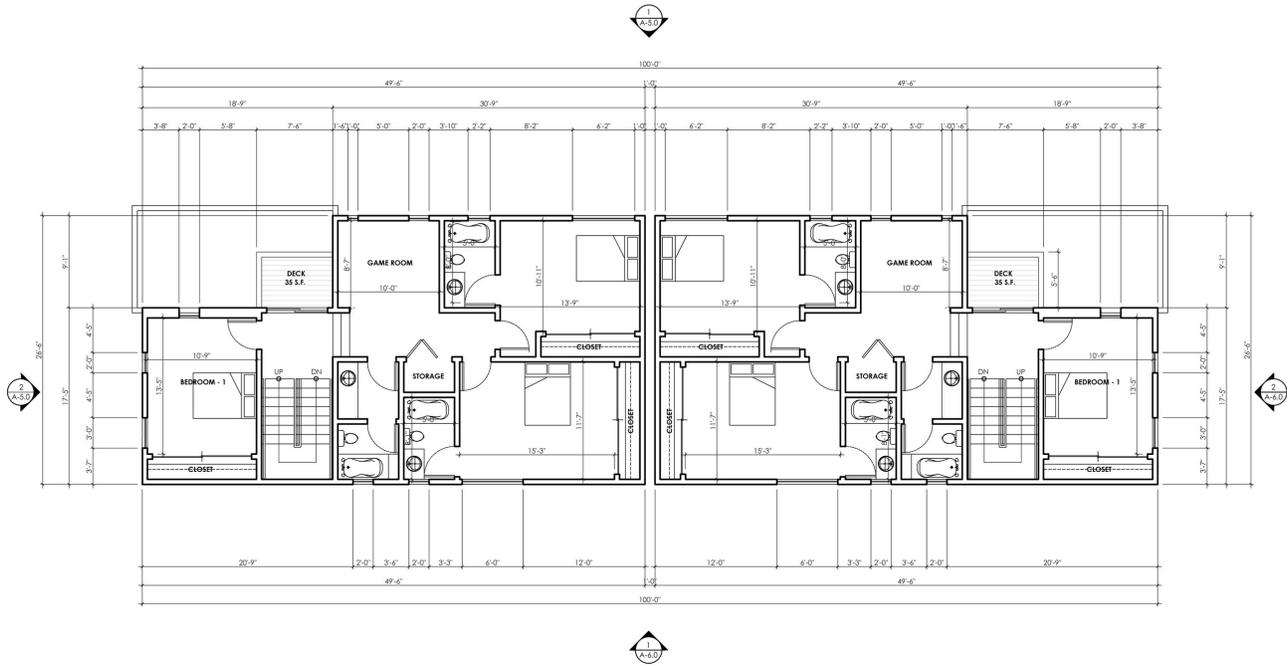


Figure 7 Second Floor Plan

1209 6th Avenue Project
 Source: Urban Planning Concepts



3RD FLOOR PLAN SCALE 1/4" = 1'-0" 1

Figure 8 Third Floor Plan

1209 6th Avenue Project
Source: Urban Planning Concepts

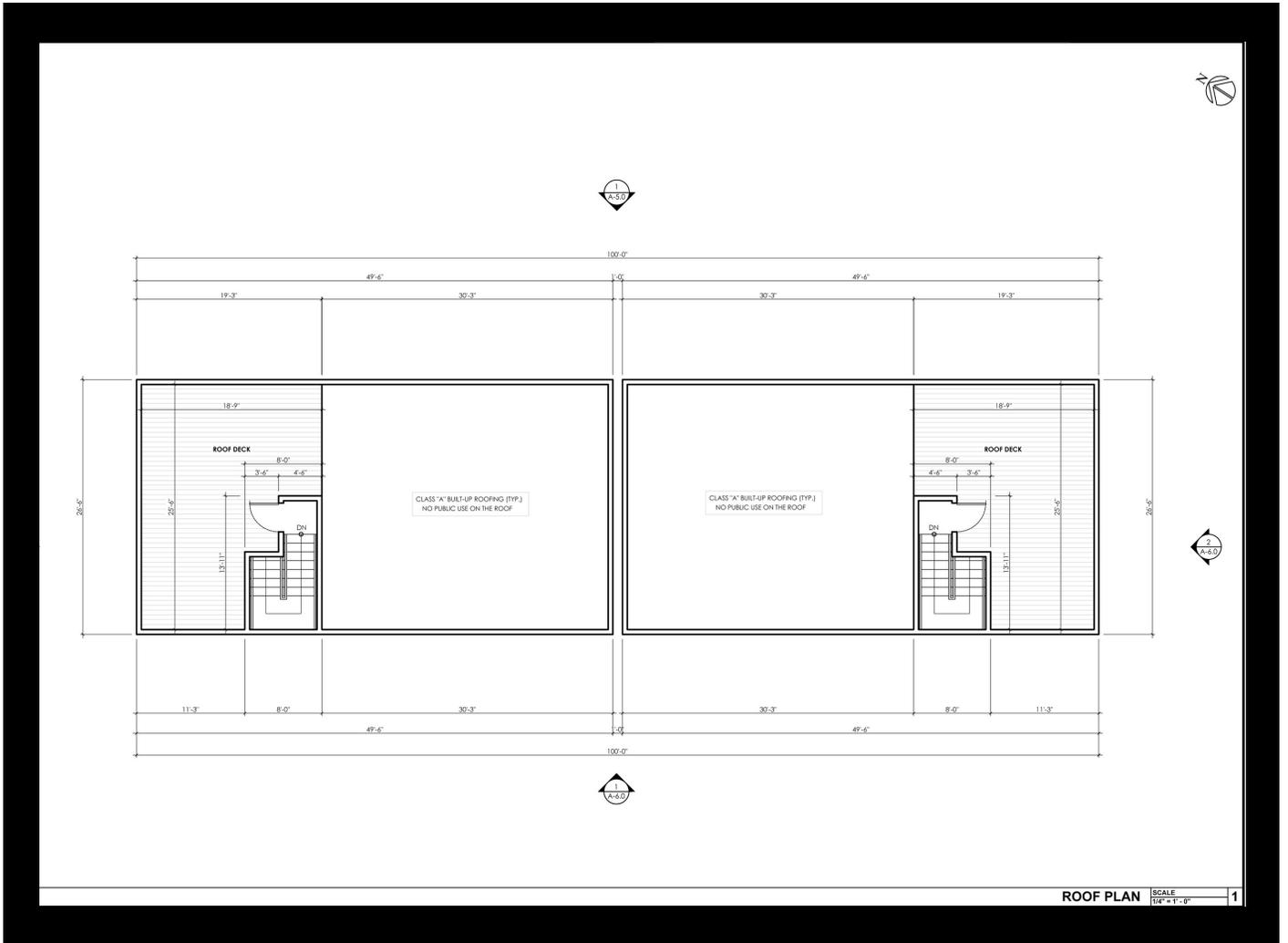
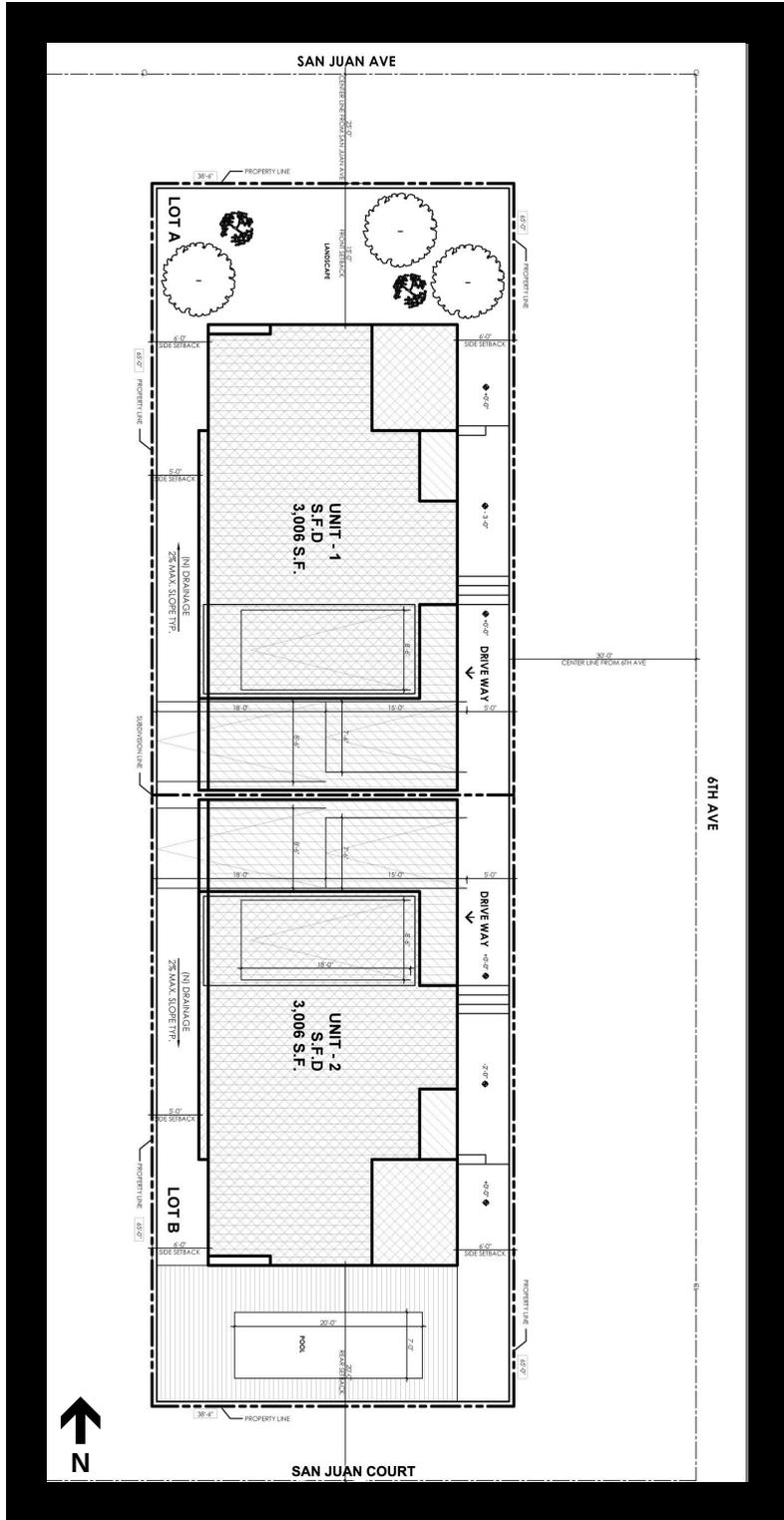


Figure 9 Roof Plan

1209 6th Avenue Project

Source: Urban Planning Concepts



DISCRETIONARY/MINISTERIAL ACTIONS REQUIRED

The City of Los Angeles (the City) is the Lead Agency for the proposed Project. The proposed Project would require approval of the following actions from the City:

- A Parcel Map to permit the subdivision of the existing Project Site into two new small lots (pursuant to Los Angeles City Municipal Code (LAMC) Section 17.50); and
- A Coastal Development Permit (CDP) to allow for the demolition of the existing 1,068 square foot vacant church and the construction of two detached Small Lot single-family units in the single-jurisdiction coastal zone;

Ministerial Actions

- Demolition, grading, and building permits;
- Haul Route approval;
- Other approvals as deemed necessary by the City

In addition, the proposed Project would be required to comply with the 2014 Small Lot Design Guidelines, specifically the guidelines included in Appendix A Venice Specific Plan Verification. The proposed Project would be constructed in accordance with the recommendations in the Geotechnical Engineering Investigation. As the Project Site is located in the City of Los Angeles Department of Building and Safety (LADBS) Methane Buffer Zone (hereinafter Methane Buffer Zone), the two Small Lot single-family units would be designed to comply with the requirements and standards required by LADBS in compliance with LAMC Section 91.7101 to 91.4009.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 360, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST (Article IV B City CEQA Guidelines)

LEAD CITY AGENCY City of Los Angeles Department of City Planning		COUNCIL DISTRICT CD 11 - Mike Bonin	DATE October 14, 2016
RESPONSIBLE AGENCIES N/A			
PROJECT TITLE/NO 1209 6 th Avenue		CASE NO. ENV-2014-1988-EIR	
PREVIOUS ACTIONS CASE NO. N/A	<input checked="" type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.		
PROJECT DESCRIPTION: The proposed Project involves the subdivision and redevelopment of a small lot (e.g. Project Site) located in the Venice Community Plan Area and the Venice Coastal Zone Specific Plan Area in the City of Los Angeles. Under the proposed Project, the existing 1,068 square foot vacant church located on the Project Site would be demolished. In addition, the Project Applicant is requesting a Parcel Map to permit the subdivision of the Project Site into two new small lots (e.g., Lot A and Lot B) to each be developed with one detached Small Lot single-family unit.			
ENVIRONMENTAL SETTING: The Project Site is approximately 0.12 acres and is developed with a vacant 1,068 church. The land uses within the general vicinity of the Project Site are characterized by a mix of multi and single-family units, which vary in building style and period of construction. Retail and restaurant uses are located along Abbott Kinney Boulevard, three blocks south of the Project Site. The Pacific Ocean is located approximately 0.7 miles to the west.			
PROJECT LOCATION: The Project Site is located in the Venice Oakwood neighborhood at 1209 6 th Avenue Los Angeles, CA 90291. The Project Site is located on the northwest corner of San Juan Avenue and 6 th Avenue (See Figures 1 and 2) (APN No 4239026001).			
PLANNING DISTRICT Venice Community Plan Area, West Los Angeles Planning Commission		STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED <u>September 29, 2000</u>	
EXISTING ZONING RD1.5-1	MAX. DENSITY ZONING 2 DU	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN	
PLANNED LAND USE & ZONE Low Medium II Residential	MAX. DENSITY PLAN 23.5 (18+ to 29) per acre		
SURROUNDING LAND USES Residential Multi- and Single-Family	PROJECT DENSITY 2 DU		

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


SIGNATURE

Planning Assistant

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analysis,” cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.

- 9) The explanation of each issue should identify:
- a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

SUPPORTING INFORMATION:

The following are also referenced where appropriate in the Environmental Checklist Form:

1. City of Los Angeles ZIMAS property information database: zimas.lacity.org. ZIMAS, Parcel Profile Report, 3/10/2016. (Attachment A).
2. CalEEMod Air Quality Model Output, May 11, 2016. (Attachment B).
3. Carlberg Associates, Horticulturists and Registered Consulting Arborists, RE: 1209 Sixth Avenue, Los Angeles California, March 28, 2015. (Attachment C)
4. Geotechnical Engineering Investigation, Proposed Two-Story Single Family Residence, Lot 1, Block Q, Ocean Park Villa Tract No. 2, 1209 S. 6th Avenue, Venice, California, C.Y. Geotech, Inc., February 16, 2015. (Attachment D)
5. SurveyLA, Venice Report, Individual Resources – 04/02/15, page 3 of 107, 1209 S 6th Avenue. (Attachment E).
6. City of Los Angeles Venice Community Plan, September 29, 2000, <http://planning.lacity.org/complan/pdf/vencptxt.pdf>
7. City of Los Angeles, Venice Coastal Zone Specific Plan, Ordinance No. 175,693, January 19, 2004. <http://planning.lacity.org/complan/specplan/pdf/VenCoastal.pdf> and <http://planning.lacity.org/complan/specplan/sparea/vencoastalpage.htm>
8. Venice Local Coastal Program Land Use Plan, <http://planning.lacity.org/complan/othrplan/pdf/venluptxt.pdf>
9. City of Los Angeles, Coastal Transportation Corridor Specific Plan, Ordinance No. 168,999, September 22, 1993. <http://planning.lacity.org/complan/specplan/sparea/coastaltranspage.htm>
10. L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Available at: <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>
11. Institute of Transportation Engineers, Trip Generation, 6th Edition, Volume 1, Generation Rate 210 for Single-Family Home.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

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

BACKGROUND

PROPONENT NAME Rockport Development	PHONE NUMBER 626-373-1234
PROPONENT ADDRESS 1654 El Camino Street Pomona, CA 91768	
AGENCY REQUIRING CHECKLIST City of Los Angeles, Department of City Planning	DATE SUBMITTED October 14, 2016
PROPOSAL NAME (If Applicable) 1209 6 th Avenue	

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

PREPARED BY Susan O'Carroll, PH.D	TITLE Principal	DATE October 14, 2016
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ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VI. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IX. HYDROLOGY AND WATER QUALITY. Would the project:

a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XI. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- | | | | | |
|-----------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

XV. RECREATION.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

XVI. TRANSPORTATION/TRAFFIC. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
freeways, pedestrian and bicycle paths, and mass transit?				
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

I. AESTHETICS.

I(a). Have a substantial adverse effect on a scenic vista?

Less Than Significant – The Project Site is located in the City of Los Angeles, in an urbanized portion of the City, approximately 0.5 miles east of PCH and 2 miles north of I-10 Freeway. The nearest scenic vista to the Project Site is the Pacific Ocean, approximately 0.7 miles west of the Site. Due to the relatively flat topography, intervening structures, and the density of development in the Project area, views of the water are not visible from the Site. Although the proposed Project would change the existing views by adding new and taller structures on the Project Site, as compared to the existing conditions, scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. As such, the proposed Project would not block or otherwise impede an existing view or scenic vista. Impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant - The Project Site is not located in close proximity to a state scenic highway. (ZIMAS, Parcel Profile Report, 3/10/2016, Attachment A). Currently, the only portion of a state scenic highway officially designated by the California Department of Transportation (Caltrans) within the City of Los Angeles is a short portion of the Pasadena Freeway (also known as the Arroyo Seco Parkway). A portion of PCH, (beginning in the City of Santa Monica and continuing north towards Malibu), is eligible to be designated as a state scenic highway.¹

The proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, as none of these resources exist on or near the Project Site. Impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant – Under the proposed Project the existing 1,068 square foot church located on the Project Site would be demolished. Development of the two Small Lot single-family units would alter the existing visual character of the Project Site.

Short-term visual impacts would occur during Site preparation and construction activities associated with the proposed Project. In a visual sense, construction impacts could be obtrusive and out of character with the surrounding landscape. Visual impacts would be created by mobile construction equipment including construction trucks that enter and exit the Project Site, construction equipment, and unfinished structures. The Project Applicant would be responsible for screening the Project Site from view with temporary fencing or other means, to reduce visual intrusion on the neighborhood. While construction of the proposed Project would result in a change in the visual character surrounding the neighborhood, these impacts would be temporary and short-term. Thus construction related impacts would be less than significant.

1

State of California Department of Transportation, Caltrans Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed July 1, 2016.

The existing multi and single-family structures surrounding the Project Site vary in age and architectural style from more contemporary structures to bungalows that were constructed in the early 1900s. The proposed Project would be consistent with the general residential character of the surrounding area and the existing uses in the immediate vicinity of the Project Site. The proposed Project's design is a modern style that is more compatible with the more contemporary designs that have been incorporated in buildings constructed over the past 10 years.

From an architectural perspective, The City of Los Angeles' Small Lot Design Guidelines (adopted January 2014) are applicable to the proposed Project. As demonstrated in **Table 2, City of Los Angeles Small Lot Design Guidelines**, the proposed Project is consistent with the applicable overarching goals and guidelines in regards to the relationship to the street, site layout and circulation, building to street proportions, parking and driveways, entryways, height and massing, building façade, roofs and materials, landscaping, front and common areas, private outdoor spaces, plant materials, privacy, and sustainability.

Table 2: City of Los Angeles Small Lot Design Guidelines	
Small Lot Design Guidelines	Project Analysis
Overarching Goals	
1. Create high-quality indoor and outdoor living environments for all residents.	Consistent. The proposed Project is designed to provide two high quality single-family detached homes. Each unit includes outdoor living areas in the form of outside decks and landscaped areas. In addition, the proposed Project would be designed with a 15-foot front yard landscaped setback along San Juan Avenue and a 20-foot rear yard setback developed with a 20 foot by 7 foot pool along San Juan Court.
2. Enhance the public realm.	Consistent. A vacant church is located on the Project Site. Boards have been placed over the windows and doors, and the vegetation is un-kept. In addition, a chain link fence surrounds a portion of the Site. The proposed Project would require the existing vacant church to be demolished and would develop the Site with two detached single-family units. Front, rear, and side setbacks would be maintained and the sizing and massing would be similar to the existing two and three story structures in the neighborhood.
3. Provide fee-simple home ownership opportunities for a greater number of people, at a wider range of income levels.	Consistent. The proposed Project is a small lot subdivision which would divide the Project Site into two smaller lots for

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
	<p>the purpose of constructing two Small Lot single-family units.</p> <p>The purpose of the small lot ordinance is to provide an alternative to traditional, suburban style single-family subdivisions by providing fee-simple homes on smaller lots.</p> <p>Under existing conditions the Project Site is developed with a vacant church. Development of proposed Project would demolish the existing vacant church and develop the Project Site with two detached Small Lot single-family units. Thus, the proposed Project would increase the City's housing stock.</p>
<p>4. Provide solutions for infill housing.</p>	<p>Consistent. The proposed Project would redevelop an infill site with two detached Small Lot single-family units, providing one additional unit as compared to existing conditions.</p>
<p>5. Design and configure housing to be compatible with the existing neighborhood context, especially in sensitive areas. This includes areas contained within Specific Plans, Community Design Overlays (CDOs), and Historic Preservation Overlay Zones (HPOZs).</p>	<p>Consistent. The proposed Project is not located within a HPOZ or CDO area. (ZIMAS, Parcel Profile Report, 3/10/201, Attachment A).</p> <p>The proposed Project is located within the Venice Community Plan Area and the Oakwood Sub-Area of the Venice Coastal Zone Specific Plan. Thus, the proposed Project would comply with the Venice Coastal Specific Plan small lot design guidelines relating to parking, driveways, setbacks, multiple lots, multiple units, and density.</p> <p>The existing multi and single-family structures surrounding the Project Site vary in age and architectural style from more contemporary structures to bungalows that were constructed in the early 1900s. The proposed Project would be consistent with the general residential character of the surrounding area and the existing uses in the immediate vicinity of the Project Site. The proposed Project's design reflects a modern style</p>

Table 2: City of Los Angeles Small Lot Design Guidelines

Table 2: City of Los Angeles Small Lot Design Guidelines	
Small Lot Design Guidelines	Project Analysis
	that is compatible with the contemporary designs that have been incorporated in buildings constructed within the past 10 years. While, the proposed Project is three stories in height, the surrounding residential buildings vary in height from one to three stories.
6. Prioritize the livability and market value of a project over strict density.	Consistent. The proposed Project has been designed to maximize the market value and livability of the development by providing two high quality Small Lot single-family homes that maintain front, rear, and side setbacks as well as provide on-site parking.
SITE PLANNING GUIDELINES	
Relationship to the Street	
1. In areas with an existing prevailing street setback, align the small lot development to be consistent with this setback and provide continuity along the street edge. Slight deviations from the setback are acceptable.	Consistent. The proposed Project has been designed to be consistent with surrounding area setbacks.
2. On residential streets with varying setbacks, the front yard setback should be within 5 feet of the average setback of adjacent properties.	Consistent. The front yard setback will be 15 feet and will be within 5 feet of the average setback of adjacent properties.
3. On commercial streets with a range of setbacks, small lot developments should nearly abut the sidewalk, allowing sufficient room for entry, front stoop, and some transitional landscaping. However, this is not required for dwellings with ground floor retail.	Not Applicable. The Project Site is located on a residential street and is not located on a commercial street.
Site Layout and Circulation	
1. Configure homes to front public streets, primary entryway, circulation walkways, and open spaces, rather than driveways.	Consistent. As shown in Figures 6 and 10 , both Small Lot single-family units frontage would face 6 th Avenue. Primary access to each unit would be along 6 th Avenue. As the Los Angeles Department of Transportation (LADOT) declared vehicle use of the ally (San Juan Court) infeasible, access to the two driveways would be along 6 th Avenue.

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
2. For homes not adjacent to the public street, provide pedestrian circulation in the form of private walkways or clearly delineated paths of travel from the sidewalk to their entryway.	Consistent. The Project Site is located adjacent to public streets.
3. Maximize green space while minimizing the total amount of driveway space.	Consistent. The proposed project has been designed to maximize green space to the extent feasible. As shown in Figure 10 , the Small Lot single-family home on the northern parcel would include landscaping within the 15-foot front yard setback area along San Juan Avenue. The Small Lot single-family home on the southern parcel would include an approximately 7-foot wide by 20-foot long pool in the 20-foot rear setback area along San Juan Court. Each Small Lot single-family home also includes a 143 square-foot deck on the second floor, a 35 square-foot deck on the third floor, and an approximately 366 square-foot deck on the roof.
4. Where possible, utilize alleyways for vehicular access.	Consistent. LADOT has determined that vehicle use of the alley (San Juan Court) is infeasible. Thus, the driveway access will be located along 6 th Avenue.
5. Take advantage of existing topography and natural features (i.e. existing trees) to maintain appropriate grade levels consistent with surrounding structures.	Consistent. The Project Site is flat and has no varying topography. The four Jacaranda trees located along the parkway are not a protected tree species as defined in Chapter IV, Article 6 of the LAMC.
6. Homes fronting a public street should have the primary entrance and main windows facing the street.	Consistent. The proposed Project's primary entrance and main windows face 6 th Avenue, which is a public street (refer to Figures 6 and 10).
7. Enhanced paving should mark the pedestrian and vehicular entries of complexes to provide a sense of arrival.	Not Applicable. The proposed Project includes the development of two detached Small Lot single-family units and would not include the construction of a complex.

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
<p>8. Design floor plan layouts in relation to lot shape, width, and depth to maximize usable outdoor spaces.</p>	<p>Consistent. The Project Site is a corner lot located at the northwest corner of San Juan Avenue and 6th Avenue. To be consistent with the existing pattern of development, Lot A’s front yard would face onto San Juan Avenue and Lot B’s front yard would face onto 6th Avenue. In addition, both Small Lot single-family units include three decks; a 143 square-foot deck on the second floor, a 35 square-foot deck on the third floor, and an approximately 366 square-foot deck on the roof.</p>
<p>9. Provide space for entry, front landing, and transitional landscaping between the public sidewalk and private entryway.</p>	<p>Consistent. As shown in Figure 6, the front entryways for each Small Lot single-family dwelling unit will be recessed, creating a front landing area.</p>
<p>10. Provide direct paths of travel for pedestrian destinations within the development. Whenever relevant, create primary entrances for pedestrians that are safe, easily accessible, and a short distance from transit stops.</p>	<p>Not Applicable. The proposed Project is not a large-scale development and does not include pedestrian destinations.</p>
<p>11. When multiple units share a common driveway that is lined with individual garages, provide distinguishable pedestrian paths to connect parking areas to articulated individual entries.</p>	<p>Not Applicable. The two detached Small Lot single-family units do not share a common driveway.</p>
<p>12. Vary building placement to increase variation in facades and more articulated building edges.</p>	<p>Consistent. Due to the Project Site size (0.12 acres), and the built-out nature of the surrounding area, the proposed Project has limited articulation. However, the window, door, driveway and deck placement has been designed to provide variation in the facades.</p>
<p>Building to Street Proportion</p>	
<p>1. Small lots should be constructed with a building-to height ratio of 1-to-4. In other words, buildings should have a height of at least one-quarter of the width of the roadway. For example, on a 100 foot wide street, an appropriate building height would be 25 feet.</p>	<p>Consistent. The proposed Project would have a maximum height of 29 feet. Both San Juan Avenue and 6th Avenue are 36 feet wide,² thus the building-to height ratio is approximately 1-1 and thus “at least one-quarter of the width of the roadway.”</p>
<p>2. Define the proper proportion of the public right of way through the planting of shade</p>	<p>Consistent. Landscape plans have not yet been prepared for the proposed</p>

² NavigateLA, City of Los Angeles Department of Public Works, Bureau of Engineering.

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
trees and low growing vegetation (see Landscaping Section for further information).	Project, it is likely that shade trees and appropriately scaled vegetation will be incorporated into the proposed Project's design.
3. Plant shade trees and ornamental plants to define the edge and increase visual interest to both the public and private realms. Avoid placing 4-foot-tall or higher shrubs immediately adjacent to the sidewalk.	Consistent. Although a detailed landscape plan has not yet been prepared for the proposed Project, it is likely that shade trees and ornamental plants will be incorporated into the proposed Project's design. Further, all vegetation will be appropriately scaled for the Project.
Parking and Driveway	
1. Locate parking to the rear of dwellings where homes front the public street.	Not Applicable. Three on-site parking spaces are provided for each Small Lot single-family unit (refer to Figure 10). The on-site parking will be located in the center of the Project Site and accessible via 6 th Avenue. LADOT has determined that the alley (San Juan Court) is not feasible for vehicle use and locating the parking in the center of the Project Site provides a buffer between the two Small Lot single-family units.
2. Where available, use alleyways as access to off-street parking.	Not Applicable. LADOT has determined that the alley (San Juan Court) is not feasible for vehicle use.
3. If individual front driveways must be used, the setback of the building should allow for an ample amount of landscaping space and a front entryway, porch, or landing.	Consistent. As shown in Figure 6 , both Small Lot single-family units will have a front entryway which is separate from the driveway area and which would allow for an appropriate porch or landing.
4. Allow for a pedestrian access path separate from driveway whenever possible. When the driveway provides pedestrian access to individual dwellings, a distinguishable path should be provided.	Consistent. Access to the Small Lot single-family units is provided from the garage as well as via the front door, off 6 th Avenue.
5. Access driveways should be designed to be no wider than circulation and backup requirements, while still allowing for landscaping and a pedestrian access path on-site.	Consistent. Both driveways are design to meet the width requirements as specified by LADOT. Pedestrian access to the Project Site is provided via the front door (along 6 th Ave) and the garage.

Table 2: City of Los Angeles Small Lot Design Guidelines

Table 2: City of Los Angeles Small Lot Design Guidelines	
Small Lot Design Guidelines	Project Analysis
6. Space permitting, design the driveway area for multifunctional uses.	Consistent. The two Small Lot single-family units include a garage and carport/covered porch, which provides for multi-functional use.
7. Structures should limit encroachment over the driveway area to not restrict the movement of trucks.	Not Applicable. The proposed Project would develop the Project Site with two detached Small Lot single-family dwelling units. Upon completion of construction activities commercial truck access is not anticipated.
BUILDING GUIDELINES	
Entry	
1. Primary entryways should be clearly identifiable and connected to the public street by a walkway. Individual residences should incorporate transitions such as landscaping, paving, porches, stoops, and canopies.	Consistent. As shown in Figure 6 , each Small Lot single-family unit includes a primary entryway that is clearly identifiable and connected to the public sidewalk by a walkway.
2. Homes that front a public street should have their primary entryway accessible from the street. Garages should not take the place of the main entryway.	Consistent. As shown in Figure 6 , each Small Lot single-family unit includes a primary entryway that is clearly identifiable and connected to the public sidewalk by a walkway. Although access is also provided through the garage, the garage does not take the place of the main entryway.
3. Entryways should sit at a grade comparable to those of the surrounding structures, and should never tower above the street.	Consistent. As shown in Figure 5 , the entryway is at grade and does not tower above the street.
4. Use ornamental low-level lighting to highlight and provide security for pedestrian paths and entrances. Ensure all parking areas and walkways are illuminated.	Consistent. The proposed Project will be subject to LAMC Section 93.0117, Outdoor Lighting Affecting Residential Property. In addition, security lighting will be provided that is comfortable and dark sky compliant by using lighting fixtures that are designed to reduce glare, light trespass, and sky glow.
5. Sole entrances should be at grade level. Homes with multiple entrances may include a secondary entrance at three to five steps above grade or consistent with the average grade of existing structures.	Consistent. As shown in Figure 5 , the primary entrance to each Small Lot single-family unit is at grade level.
6. Entrances that front commercial boulevards should allow room for a stoop and entryway and ideally some landscaped area.	Not Applicable. The Project Site does not front, nor is it adjacent to, a commercial boulevard.

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Small Lot Design Guidelines	Project Analysis
<p>7. Ground-floor commercial arrangements fronting on the street in a commercial district do not require a separation between the entry and the street. See Special Guidelines for Ground-Floor Commercial Uses (p. 28) for further information.</p>	<p>Not Applicable. The proposed Project would develop the Project Site with two detached Small Lot single-family units. The proposed Project does not include a commercial component.</p>
<p>8. Incorporate transitions such as landscaping, paving material, porches, stoops, and canopies at the primary entrance to each residence, and at the main pedestrian entrance to the development from the sidewalk.</p>	<p>Consistent. Although detailed landscape plans have not yet been prepared, each Small Lot single-family unit does include a front stoop area, and three outside decks.</p>
<p>Height and Massing</p>	
<p>1. Use the surrounding built environment to inform decisions about variations in height and massing.</p>	<p>Consistent. The proposed Project would be similar in height and massing to two existing developments visible from the Project Site: a three story apartment building located to the south and visible from 6th Avenue and a three story apartment building located to the northwest along San Juan Court. The proposed Project's design will reflect a modern style and be consistent with the surrounding structures constructed in the last 10 years.</p>
<p>2. Avoid excessive differences in height between the proposed development and adjacent buildings.</p>	<p>Consistent. A two-story single-family unit is located immediately west of the Project Site. In addition, a two-story multi-family building is located caddy corner to the Project Site. As discussed above, two existing three-story multi-family structures are located in close proximity to the Site. The existing roadways (6th Avenue and San Juan Avenue) provide a buffer between the one-story single-family units located immediately north and east of the Project Site.</p>
<p>3. Provide sufficient space between buildings, articulation along the street frontage, and visual breaks to diminish the scale and massing.</p>	<p>Consistent. As shown in Figure 5, breaks in scale and massing would be established by the placement of windows, doors, driveways, carports, and decks. In addition, the proposed Project would comply with the RD1.5-1 front, rear, and side yard setbacks.</p>
<p>4. Small lot developments should be appropriately designed and scaled to</p>	<p>Consistent. The proposed Project includes the construction of two</p>

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
<p>transition from single-family properties using methods such as step backs, building placement, driveway location, variations in height, and landscape screening elements.</p>	<p>detached Small Lot single-family units. Project elements, including the placement of the driveways in the center of the Site, a recessed third floor, an entry stoop area, and landscaped area along San Juan Avenue would ensure the proposed Project's design is compatible with the existing surrounding residential uses.</p>
<p>Building Façade</p>	
<p>1. Employ architectural details to enhance scale and interest by breaking the facade up into distinct planes that are offset from the main building facade.</p>	<p>Consistent. The proposed Project would incorporate architectural features including large windows, front door stoop, outdoor deck areas, and a recessed third floor to avoid areas with large blank walls.</p>
<p>2. The placement of windows should follow a consistent rhythm to create visual clarity and character-defining features while avoiding the creation of blank walls.</p>	<p>Consistent. As shown in Figure 5, the placement of windows in the two Small Lot single-family units follow a consistent rhythm. Windows, doors, carports, decks and roof elements have been used with the intent of avoiding the creation of blank walls.</p>
<p>3. Provide windows on building facades that front on public streets, private driveways, and internal pedestrian pathways within the development.</p>	<p>Consistent. As shown on the project plans, windows have been provided on the facades of the two Small Lot single-family units, that front on public streets.</p>
<p>4. Layer architectural features to emphasize elements such as entries, corners, windows, and organization of units.</p>	<p>Consistent. As shown in Figure 5, breaks in scale and massing and the use of a various building materials are included in the proposed Project design.</p>
<p>5. Alternate different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding blank facades.</p>	<p>Consistent. Various building materials for the proposed Project façade enhance the structures' appearance and avoid blank facades.</p>
<p>6. Treat all facades of the building with an equal level of detail, articulation, and architectural rigor.</p>	<p>Consistent. An equal level of detail has been incorporated in each of the Small Lot single-family units' four facades. While the front and rear facades are larger and thus, have a greater level of detail, the landscaped and pool area are located along the sides of the Project Site and provide an added level of detail to these portions of the Project Site.</p>

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Small Lot Design Guidelines	Project Analysis
7. Include overhead architectural features at entrances and windows that provide shade and passive cooling.	Consistent. Details on any overhead architectural features at entrances and windows are not yet available. However, the project will be designed to be consistent the Small Lot Design Guidelines.
8. Design balconies so that their size and location maximize their intended use for open space. Avoid “tacked on” balconies with limited purpose or function.	Consistent. Each Small Lot single-family unit includes a 143 square-foot deck on the second floor, a 35 square-foot deck on the third floor, and an approximately 366 square-foot roof deck. The three decks are large enough to be used for a variety of purposes. The placements of the decks are shown in Figures 7, 8 and 9.
9. Reduce the monotony of undifferentiated facades through landscape screening elements, entry enhancements, and building/garage facades.	Consistent. As shown in Figure 5, the placement of windows, doors, driveways, carports, and decks would reduce large areas of blank walls and monotonous facades. In addition, a variety of building materials would be used on the buildings’ facades.
Building Materials	
1. Select building materials, such as architectural details and finishes that convey a sense of permanence. Quality materials should be used to withstand weather and wear regardless of architectural style.	Consistent. Details on building materials and treatments are not yet available. However, quality materials will be used. Further, the Project will be designed to be consistent the Small Lot Design Guidelines.
2. Apply trim, metal and woodwork, lighting, and other details in a harmonious manner that is consistent with the proportions and scale of the buildings.	Consistent. Details on building materials and treatments are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
3. Materials should appropriately respond to the neighborhood context.	Consistent. Details on building materials and treatments are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
4. Apply changes in material purposefully and in a manner corresponding to variations in building mass.	Consistent. Details on building materials and treatments are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
Roof	
1. Integrate varied roof lines into the upper floors of residences through the use of	Consistent. The rooflines would vary from 29 feet to 26.5 feet. As shown in

Table 2: City of Los Angeles Small Lot Design Guidelines

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Small Lot Design Guidelines	Project Analysis
sloping roofs, modulated building heights, gables, dormers, and innovative architectural techniques.	Figure 5 , the two Small Lot single-family units would have a varied roofline, including a slight slope to the roof, a roof deck and setback roof access.
2. Avoid excessive use of multi-pitched and gabled roofs	Consistent. As shown in Figure 5 , the proposed Project does not include excessive use of multi-pitched or gabled roofs.
3. Where appropriate, consider enhancing roof areas with usable open space.	Consistent. Both Small Lot single-family units include a roof deck designed for usable open space.
4. Consider the design and placement of ridge locations as well as direction in relation to side yards and atriums.	Consistent. As determined by LADOT, the alley way is not feasible for vehicle use. The two side yard areas are located at the north and south ends of the Project Site.
LANDSCAPING GUIDELINES	
Front and Common Areas	
1. Use a range of low-water and drought-tolerant plant materials and ground cover to provide visual interest in place of turf grass.	Consistent. As of January 1, 2011 projects in the City of Los Angeles are subject to the City of Los Angeles Green Building Code (LAGBC). The proposed Project would be required to comply with the Irrigation Guidelines and to obtain a Landscaping Permit from the City of Los Angeles, which requires submittal of an irrigation plan with Water Management Point System Certification (LAMC 12.41.B1) or demonstration of compliance with the City’s Landscape Ordinance.
2. Use fences and shrubbery less than 3’6” tall in areas adjacent to the sidewalk (within 5’ of front lot line), and common public areas.	Details on landscape design are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
3. Plant shade trees within public areas, ideally spaced between 15’ and 20’ apart, to screen blank building facades and shade the driveway and parking areas.	Details on landscape design are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
4. Whenever possible, use subtle variations in grade	Details on landscape design are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.
5. Plant parkways separating the curb from the sidewalk with trees, ground cover, low-growing vegetation, or permeable materials that accommodate both	Details on landscape design are not yet available. However, the Project will be designed to be consistent the Small Lot Design Guidelines.

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Small Lot Design Guidelines	Project Analysis
pedestrian movement and clearance for car doors.	
6. Design the landscape to be integrated with the building and for the intended use of the space.	Details on landscape design are not yet available. However, the Project will be designed to be consistent with the Small Lot Design Guidelines.
Private Outdoor Space	
1. Designate fully private outdoor space whenever possible.	Consistent. As shown in Figure 10 , the proposed Project would provide private outdoor open space in the form of a landscaped and pool area. In addition, each Small Lot single-family unit would include a 143 square-foot second floor deck, a 35 square-foot third floor deck, and an approximately 366 square-foot roof deck on the roof.
2. Utilize plants that can be easily modified/maintained by residents.	Details on landscape design are not yet available. However, the Project will be designed to be consistent with the Small Lot Design Guidelines.
3. Provide balconies to enhance rather than substitute for actively used common open spaces. Balconies and roof decks should be generous enough in size to create usable spaces.	Both Small Lot single-family units would include three decks: a 143 square-foot second floor deck, a 35 square-foot third floor deck, and an approximately 366 square-foot roof deck. The placement of the decks, as shown in Figures 7, 8 and 9 is would afford functionality and creates useable spaces.
Plant Materials	
1. Apply mulch in between and around plants to conserve moisture and eliminate bare earth, which can look unsightly	Consistent. The proposed Project landscaped areas would comply with applicable City requirements.
2. Use water-conserving ground cover instead of turf grass.	Consistent. Details on landscape design are not yet available. The Project will comply with applicable City requirements.
3. Avoid invasive plant materials.	Consistent. Details on landscape design are not yet available. The Project will comply with applicable City requirements.
4. Plant in groupings according to water needs.	Consistent. As of January 1, 2011 projects in the City of Los Angeles are subject to the City of Los Angeles Green Building Code (LAGBC). The proposed Project is required to comply with the Irrigation Guidelines and to obtain a Landscaping Permit from the City of Los Angeles.

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Small Lot Design Guidelines	Project Analysis
	Angeles, which requires submittal of an irrigation plan with Water Management Point System Certification (LAMC 12.41.B1) or demonstration of compliance with the City’s Landscape Ordinance.
5. Incorporate existing natural features and topography	Not Applicable. No existing natural features are present on the Project Site with is flat.
Privacy	
1. Windows and balconies from separate dwellings should not face or overlook each other.	Consistent. The windows of each Small Lot single-family unit do not face or overlook each other. Further, the balconies and roof decks have been designed to be as far apart from the other unit’s balconies/roof deck as possible, and they do not overlook and/or face each other.
2. Minimize the number of windows overlooking neighboring interior private yards.	Consistent. The majority of the windows overlook the street. A limited number of windows face adjacent properties (including any adjacent open space)
3. Use translucent glass, landscaping, and screens to create privacy.	Consistent. Details on landscape design are not yet available. The Project will comply with applicable City requirements.
4. Provide functional distances between building walls and vary height to maximize private outdoor space, light and views.	Consistent. The Project design maximizes the distance between the two detached Small Lot single-family units to the greatest extent feasible. Private outdoor space is maximized by maintaining the required setbacks and providing separate pool and landscaped areas. In addition, each Small Lot single-family home includes a 143 square-foot second floor deck, a 35 square-foot third floor deck, and an approximately 366 square-foot roof deck.
5. Plant trees, shrubs, and vines to screen walls between property lines. Use variations in color, material, and texture	Consistent. Details on landscape design are not yet available. The proposed Project will comply with applicable City requirements.

Table 2: City of Los Angeles Small Lot Design Guidelines

Table 2: City of Los Angeles Small Lot Design Guidelines	
Small Lot Design Guidelines	Project Analysis
6. Rooftop open space should be located away from the building edge to enhance privacy.	Consistent. The rooftop deck does not extend to the buildings' edge except along the southern edge of Lot B (which is adjacent to the pool) and along the western edge of Lot A (which is adjacent to the landscaped area).
SUSTAINABILITY GUIDELINES	
Site Plan	
1. Incorporate renewable energy technologies (such as photovoltaic panels) on-site.	Consistent. The proposed Project includes the construction of two Small Lot single-family units in accordance with Title 24 and the energy efficient measures in the CALGreen Code. The CALGreen Code requires that new structures increase building system efficiencies.
2. Use permeable paving materials (such as porous asphalt, porous concrete, permeable concrete pavers and grid systems filled with gravel or grass) where allowed by the Alternative Paving Material Ordinance (No. 182431).	Consistent. Details on landscape design are not yet available. The Project will comply with applicable City requirements.
3. Utilize adequate, uniform, and glare-free lighting such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage.	Consistent. The proposed Project would include appropriate lighting per City standards. In addition, the proposed Project would be required comply with the City lighting standards outlined in Section 93.0117 of the LAMC. All exterior lighting would be dark sky compliant by using light fixtures that are designed to reduce glare, light trespass, and sky glow.
4. Reduce pollution by controlling soil erosion, waterway sedimentation and airborne dust generation.	Consistent. The proposed Project would comply with SCAQMD Rule 403 which would reduce fugitive dust as well as Rule 402 which requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site. In addition, construction activities associated with the proposed Project would be subject to local and state erosion control and grading regulations, including, but not limited to, grading permits and haul route approval from the LADBS.

Table 2: City of Los Angeles Small Lot Design Guidelines

Small Lot Design Guidelines	Project Analysis
5. Seamlessly integrate the SUSMP and LID elements into the project design.	Consistent. Due to the type and level of development, the proposed Project is not required to prepare a SUSMP. ³ The proposed Project is however subject to the City's Low Impact Development (LID) Ordinance.
Sustainability Building	
1. Use passive cooling systems like operable windows for ventilation.	Consistent. The Project would include operable windows and doors for ventilation.
2. Provide controllable systems such as localized thermostat control, task lighting, or localized lighting controls.	Consistent. The Project will comply with the applicable edition of The California Building Code, California Electrical Code, California Plumbing Code, California Mechanical Code, California Fire Code and California Energy Code. 2008. Specific design detail is not yet available.
3. Provide connection between indoor and outdoor spaces to take advantage of natural light and ventilation.	Consistent. Each Small Lot single-family unit will include three deck areas. In addition, the proposed Project has incorporated windows on each side of the structure which are operable and would provide natural light and ventilation.
4. Maximize water efficiency and minimize water waste within buildings.	Consistent. The proposed Project will incorporate sustainable development principles including the use of water efficiency measures where applicable, including smart irrigation systems and low flow fixtures and toilets. In addition, the proposed Project would be required to comply with AB 939 and recycle at least 50 percent of its construction waste. Once operational, the City of Los Angeles Bureau of Sanitation Department would provide receptacles for recycling. In addition, the proposed Project would comply with the CALGreen Code that requires new structures to reduce water consumption and divert construction waste from landfills.

³ City of Los Angeles Watershed Protection Program, <http://www.lastormwater.org/siteorg/businesses/susmp/susmpintro.htm>, accessed September 13, 2016.

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Small Lot Design Guidelines	Project Analysis
5. Use energy efficient equipment to increase the energy efficiency of the buildings.	Consistent. The proposed Project includes the construction of two Small Lot single-family units in accordance with the latest energy efficiency measures including Title 24 and CalGreen requirements.
6. Use renewable, recycled, and regional materials.	Consistent. Specific building materials information is not yet available. However, the Project will be designed to be consistent with the Small Lot Design Guidelines.
7. Use certified wood provided from environmentally responsible forest management.	Consistent. Specific building materials information is not yet available. However, the Project will be designed to be consistent with the Small Lot Design Guidelines.
8. Use or redirect demolition material to recyclable or reusable centers (Ord. 181519).	Consistent. The proposed Project would be subject to AB 939 and required to divert at least 50 percent of its construction waste.
Sustainability Landscape	
1. Plant trees to shade buildings to reduce the heat island effect.	Consistent. Specific information on landscape design is not yet available. However, the Project will be designed to be consistent with the Small Lot Design Guidelines.
2. Facilitate storm water capture, retention and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse storm water for landscape irrigation as per SUSMP and LID requirements.	Consistent. The proposed Project is subject to the City’s Low Impact Development (LID) Ordinance. “The LID ordinance requires rainwater from a three-quarter inch rainstorm to be captured, infiltrated and, or used, onsite at most developments and redevelopments where more than 500 square feet of hardscape is added. Most single family units can comply in a more simple way by installing adequate Best Management Practices (BMPs) such as rain barrels, permeable pavement, rainwater storage tanks, or infiltration swales to contain the water.” ⁴ The proposed Project would not result in unpermitted discharges into the sanitary sewer and stormwater systems. The

⁴ City of Los Angeles Watershed Protection Program, <http://www.lastormwater.org/green-la/low-impact-development/faqs/how-does-the-lid-ordinance-affect-my-project/>, accessed September 13, 2016.

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	proposed Project would not violate any water quality standards or waste discharge requirements.
<p>3. Los Angeles Low-Impact Development (LID) and Standard Urban Stormwater Mitigation Plan (SUSMP) requirements mandate stormwater to be managed through filtration or reuse for all development projects, including small lot developments. There are various ways to incorporate storm water techniques while also using thoughtful design. The City offers different storm water management techniques that don't overwhelming the design of the project. Some of these include:</p> <ol style="list-style-type: none"> 1. Rain Barrels and Small Cisterns 2. Permeable and Porous Pavement Systems 3. Planter Boxes 4. Rain Gardens 5. Dry Wells 	<p>Consistent. The proposed Project would be subject to and required to implement the LID BMPs.</p>
APPENDIX A: VENICE SPECIFIC PLAN VERIFICATION	
<p>1. Required parking for subdivision projects shall be based on the parking requirements pursuant to the Venice Coastal Specific Plan—2 or 3 spaces, depending on lot width. Each new lot resulting from a small lot subdivision that contains one unit will fall under the "single family dwelling" category in the Specific Plan. For purposes of parking calculations, small lot subdivisions shall be considered "less than 40 feet in width, or less than 35 feet in width if adjacent to an alley." Where new lots resulting from a small lot subdivision include multiple units on a lot, they shall provide 2.25 parking spaces for each dwelling unit.</p>	<p>Consistent. The proposed Project meets the parking requirements as outlined in the Venice Coastal Specific Plan and would provide three parking spaces per single-family unit.</p>
<p>2. All driveways and vehicular access shall be from the alleys, when present. When projects abut an alley, each newly resulting subdivided lot shall be accessible from the alley and not the street. Exceptions may be made for existing structures where alley access is infeasible</p>	<p>Not Applicable. LADOT has determined that the alley (San Juan Court) is infeasible for vehicle use due to safety concerns. The proposed Project does not effectively have alley access.</p>

Table 2: City of Los Angeles Small Lot Design Guidelines	
Small Lot Design Guidelines	Project Analysis
<p>3. Front, rear and side yard setbacks abutting an area outside of the subdivision shall be consistent with the Specific Plan, where it sets limitations. This includes locations in which new lots abut a lot that is not created pursuant to the Small Lot Subdivision Ordinance and not part of the project, or where the lots abut a waterway or street.</p>	<p>Consistent. The Project has been designed to be consistent with applicable setback requirements. As directed in Appendix A Venice Specific Plan Verification of the Small Lot Guidelines, “Front, rear, and side yard setbacks abutting an outside area of the subdivision shall be consistent with the Specific Plan, where it sets limitations. The Venice Coastal Zone Specific Plan does not include setback limitations for the Oakwood neighborhood where the Project Site is located.</p>
<p>4. Existing lots may be subdivided into multiple lots so long as the averaged newly resulting lot size is equivalent to the minimum requirement for “lot area per dwelling unit” established for each residential zone in the LAMC, pursuant to the Small Lot Subdivision Ordinance.</p>	<p>Consistent. As stated in the Venice Coastal Zone Specific Plan RD1.5 lots can be developed with a maximum of two dwelling units per lot. The proposed Project would develop each lot with one detached Small Lot single-family unit.</p>
<p>5. Lots subdivided pursuant to the Small Lot Subdivision Ordinance shall be limited to one unit per resultant lot, unless the lot size is large enough to permit additional units based on the “lot area per dwelling unit” calculation established for each residential zone. In no case may a newly resultant lot contain more than three units. Generally, the combined density of the newly resulting lots shall not exceed the permitted density of the original lot, pre-subdivision. For Subareas of Venice that restrict density by limiting the number of units on a lot by a defined number, the resulting density from multiple lots may increase the originally permitted density on one original lot. Unit restrictions prescribed for Subareas shall still apply to individual resulting lots, but not over the entire pre-subdivided area.</p>	<p>Consistent. As specified by the Small Lot Subdivision Ordinance, each resulting lot will have only one Small Lot single-family unit per lot.</p>
<p>Source: City of Los Angeles 2014 Small Lot Design Guidelines</p>	

Additional analysis regarding the proposed Project’s impacts to the existing visual character of the Project Site and the surrounding area is included in **Table 3, City of Los Angeles CEQA Thresholds Guide Aesthetics Screening Criteria: Visual Character.**⁵

Table 3: City of Los Angeles CEQA Thresholds Guide Aesthetics Screening Criteria: Visual Character

Screening Criteria	Project Analysis
<p>1. Does the project include a proposed zone change or variance that would increase density, height, and bulk in areas where there is a consistent theme, style, or building height and setbacks?</p>	<p>No. The proposed Project would not require a proposed zone change or variance that would increase density, height, and bulk in areas where there is a consistent theme, style, or building height and setbacks. Multi-family and single-family structures located in the Project area exhibit a variety of architectural themes, styles, building heights and setbacks. The proposed Project would comply with the Venice Coastal Zone Specific Plan density and height requirements for the Oakwood Sub Area. As directed by LADOT vehicular access (including a carport and garage) to the Project Site would be provided via 6th Avenue.</p>
<p>2. Does the project include a proposal to develop or allow development in an existing natural open space area (not including previously developed or infill lots)?</p>	<p>No. The proposed Project would not include a proposal to develop or allow development in an existing natural open space area (not including previously developed or infill lots). The Project Site is located in a residential neighborhood and is developed with a vacant church.</p>
<p>3. Would the project result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area?</p>	<p>No. The proposed Project would not result in the removal of one or more features that contribute to the valued aesthetic character or image of the neighborhood, community, or localized area, including a structure with visual prominence, public plaza, or garden, heritage oak and/or additional City protected trees, pedestrian amenities, landscape medians, and/or parks. As discussed in Section V Cultural Resources below, the existing structure is eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources. Refer to Section V Cultural Resources Threshold (a) for impacts to historic resources.</p>

Table 3: City of Los Angeles CEQA Thresholds Guide Aesthetics Screening Criteria: Visual Character	
Screening Criteria	Project Analysis
4. Would the project introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines?	Consistent. The proposed Project would not introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines. The proposed Project would develop the project site with two Small Lot single-family dwelling units. As discussed above, the proposed Project would comply with the height, setback, and vehicular access policies applicable to properties located in the Oakwood Sub Area.
Source: City of Los Angeles 2006 CEQA Threshold Guidelines	

As the proposed Project would be consistent with the City’s 2014 Small Lot Design Guidelines and the CEQA Thresholds Guide Aesthetics Screening Criteria, impacts would be less than significant. No further analysis is required in the EIR.

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

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

Under the proposed Project the existing 1,068 square foot church located on the Project Site would be demolished. The Project Applicant is requesting to subdivide the Project Site and develop the site with two detached three-story Small Lot single-family units. The proposed Project would be constructed on an infill site. While the Project Site is developed, the existing structure is vacant. The Project Site is located in an urban environment characterized by high levels of ambient nighttime illumination, however nighttime illumination levels are not high at the Project Site. Uses surrounding the Project Site that are sensitive to light levels and glare include multi and single-family uses.

The two Small Lot single-family units would be a maximum of 29 feet in height. The proposed Project would increase the nighttime illumination on the Project Site from current levels. Lighting associated with the proposed residential use would include interior lights, architectural and/or thematic accent lighting to highlight building elements or details, soft

accent lighting for landscaping where appropriate, exterior security lighting, and wall- or pole-mounted light fixtures. All lighting of outdoor areas will be directed onto driveways, walkways, and parking areas and away from adjacent properties and public rights of way to avoid any light impacts from lighting fixtures included in the proposed Project. For these reasons, the new lighting established on the Project Site would not result in a substantial increase in light that could adversely affect nighttime views in the area.

Daytime glare is common in urban areas and is typically associated with mid to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. The Small Lot single-family units' façades do not consist of substantial amounts of highly reflective glass or mirror-like materials. Non-reflective building materials would be used in the construction of the proposed Project, and thus the proposed Project would not result in a substantial new source of glare that significantly impact daytime and/or nighttime views in the area. Additionally, the proposed Project would be required comply with the City lighting standards outlined in Section 93.0117 of the LAMC. In addition, all exterior lighting would be dark sky compliant by using light fixtures that are designed to reduce glare, light trespass, and sky glow.

As shown in **Table 4, City of Los Angeles CEQA Thresholds Guide to Aesthetics Screening Criteria: Lighting**, below, the proposed Project would be consistent with the City of Los Angeles CEQA Thresholds Guide light and glare screening criteria.⁶

Table 4: City of Los Angeles CEQA Thresholds Guide Aesthetics Screening Criteria: Lighting	
Screening Criteria	Project Analysis
1. Would the proposed project introduce light likely to increase ambient nighttime illumination levels beyond the property line of the project site?	The proposed Project would not introduce light likely to increase ambient nighttime illumination levels beyond the Project Site.
2. Does the project include lighting that would routinely spillover onto a light-sensitive land use?	The proposed Project does not include lighting that would routinely spillover onto a light-sensitive land use. The proposed Project would use light fixtures that are designed to reduce light trespassing onto adjacent properties.
Source: City of Los Angeles 2006 CEQA Thresholds	

Therefore, impacts associated with light and glare would be less than significant. No further analysis is required in the EIR.

⁶ CEQA Thresholds Guide, City of Los Angeles, 2006. Page A.4-1, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>, accessed September 13, 2016.

II. AGRICULTURE AND FOREST RESOURCES.

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

No Impact - The Project Site is an infill site located in a developed residential neighborhood in the Venice Community Plan Area. The Project Site is developed with a 1,068 square foot vacant church. The Project Site is not located in a mapped farmland area.⁷ No impacts to Prime Farmland, Unique Farmland or Farmland of Statewide Importance would result from development of the proposed Project. No further analysis is required in the EIR.

II(b). **Conflict with existing zoning for agricultural use, or Williamson Act Contract?**

No Impact - The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area and zoned RD1.5-1. The Project Site is not zoned for agricultural uses, nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. There are no Williamson Act contracts in the Project vicinity.⁸ The proposed Project would therefore have no impact on Williamson Act contracts. No further analysis is required in the EIR.

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

No Impact – As discussed above the Project Site is zoned RD1.5-1. The Project Site is located in an urban area and zoned for residential uses. No forest land or land zoned for timberland production is present on-site or in the surrounding area.⁹ As such, the proposed Project would not conflict with or cause rezoning of forestland. No forest or timberland impacts would result from the proposed Project. No further analysis is required in the EIR.

II(d). **Result in loss of forest land or conversion of forest land to non-forest use?**

No Impact – See response to threshold II(c) above. Additionally, forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”¹⁰ Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.” There are four trees located on the Project Site. Trees are also located along the parkways adjacent to the Project Site, but are largely ornamental. There is no forest land or timberland on-site or in the Project vicinity and Project development

⁷ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2010 and Los Angeles County Williamson Act Map 2011- 2012, accessed June 21, 2013.

⁸ Ibid.

⁹ Ibid.

¹⁰ PRC 12220(g)

would not cause a loss of forest land or timberland. No impacts would occur, and no further analysis is required in the EIR.

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

Less Than Significant - The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area. No farmland or forestland is located in the vicinity of the proposed Project. A few plant containers from backyard gardeners are located on the Project parkway. Loss of this limited amount of community farming activity does not represent a conversion of farmland to non-agricultural use. Impacts would be less than significant. No further analysis is required in the EIR.

III. AIR QUALITY.

III(a). Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant – The proposed Project is located within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The SCAB is managed by the South Coast Air Quality Management District (SCAQMD). The Project Site is subject to the Air Quality Management Plan (AQMP) prepared by the SCAQMD.

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements. The most recently adopted plan is the 2012 AQMP that was adopted by the SCAQMD Governing board on December 7, 2012. The SCAQMD is the process of developing the 2016 AQMP. The AQMP is the South Coast Air Basin's portion of the State Implementation Plan (SIP).

The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (except as provided for CO in Section 9.4 for relocating CO hotspots).
- (2) Whether the project will exceed the assumptions utilized in the preparation of the AQMP or if a project is inconsistent with the growth assumptions upon which the regional AQMP was based.

In terms of Criterion 1, under the proposed Project, the existing 1,068 square foot vacant church would be demolished and two detached Small Lot single-family units would be constructed. Given the nature of the proposed use, the proposed Project would generate operational emissions well below the SCAQMD's thresholds of significance (see threshold

III(b) below). It therefore would not increase the frequency or severity of existing air quality violations or contribute to new violations.

In terms of Criterion 2, the Project Site is located in a developed residential neighborhood in the Venice Community Plan Area. The 2012 AQMP focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The adopted 2016 RTP/SCS accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040. Projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. Consistency with the assumptions in the AQMP is established by demonstrating that the proposed Project is consistent with the land use plan that was used to generate the growth forecast. Due to the limited number of single-family units developed under the proposed Project, only a minimal increase in population could be expected to occur. This population growth would be well within SCAG projections for the City and would not exceed the growth assumptions within the AQMP. Further, the proposed Project is consistent with the zoning and land use designation for the Project Site. It is thus consistent with the assumptions in the AQMP and the projections included in SCAG's 2016 RTP/SCS. Impacts would be less than significant and no further analysis is required in the EIR.

III(b). Violate any air quality standards or contribute substantially to an existing or projected air quality violation?

Less Than Significant – See discussion under threshold III(c), below. Impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant – Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. Air pollutants are categorized as primary or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. Of these, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} are "criteria air pollutants," which means that ambient air quality standards have been established for them at the federal level (NAAQS) and state level (CAAQS). The SCAB is currently in nonattainment for the one-hour and eight-hour ozone (O₃), PM₁₀, PM_{2.5}, and Pb. The SCAB is currently a designated attainment area for the remaining criteria pollutants, which include carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂).¹¹

As discussed under threshold III(a) above, the proposed Project would be consistent with the air quality regional plans and the region's ability to meet state and federal ambient air quality standards.

11 2016 NAAQS and CAAQS Attainment Status for SCAB, <http://www.arb.ca.gov/desig/desig.htm>, accessed July 5, 2016.

Construction of the proposed Project would require the demolition of the existing 1,068 square foot vacant church and development of two Small Lot single-family units. Short-term air pollutant emissions would occur during site preparation and construction activities associated with the proposed Project. Construction emissions were modeled using SCAGMD's CalEEMod 2013.2.2, a land use and construction model used to calculate emissions generated from construction and operation of new development projects. Where project specific information was not available, model default values provided by CalEEMod were used (see Attachment B). As shown in **Table 5, Project Construction and SCAQMD Construction Emissions Thresholds**, the proposed Project would not exceed any of the SCAQMD significance thresholds for air quality emissions during construction; impacts would be less than significant. Further, construction emissions associated with the proposed Project would be further reduced through compliance with SCAQMD Rule 403 (Fugitive Dust).

Table 5: Project Construction Emissions and SCAQMD Construction Emissions Thresholds (lbs/day on the worst day)						
	ROG	NO _x	CO	SO ₂	PM10	PM2.5
Project Emissions	9.7	12.71	9.34	.01	1.59	1.13
SCAQMD Regional Thresholds	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Emission Estimates in Attachment B

Operational emissions would be generated by mobile sources, area sources, and stationary sources as a result of normal day-to-day activity on the Project Site. Mobile source emissions would be generated by motor vehicles traveling to and from the Project Site. Area emission would be generated by the combustion of natural gas in space and water heating devices, the operation of landscape maintenance equipment, the use of consumer products, and the application of architectural coatings (for building maintenance). During operation, the proposed Project is not expected to generate substantial air pollutants. As shown in **Table 6, SCAQMD Operational Thresholds**, Project operational emissions would be well below the SCAQMD operation thresholds.

Table 6: Project Operational Emissions and SCAQMD Operational Thresholds (peak lbs/day)						
	ROG	NO _x	CO	SO ₂	PM10	PM2.5
Project Emissions	0.73	.024	2.05	0.00	0.30	0.20
SCAQMD Regional Thresholds	55	55	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Emission Estimates in Attachment B

As shown in the two tables above, neither construction nor operation of the proposed Project would generate air pollutants in excess of the SCAQMD's regional significance thresholds. Therefore, the proposed Project would not cause or substantially contribute to an existing or

projected air quality violation, would not generate pollutants in excess of SCAQMD standards, and would not result in a cumulative considerable net increase of any criteria pollutant. Impacts would be less than significant and no further analysis required in the EIR.

III(d). Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant – An impact is significant if sensitive receptors (such as children and the elderly) are exposed to substantial pollutant concentrations such as toxic air contaminants (TACs) and CO concentrations. Sensitive receptor locations include residences, schools, playgrounds, childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The land uses located within the vicinity of the Project Site that are sensitive to air pollution include residential uses, schools, churches, and parks.

The proposed Project includes the construction and operation of two Small Lot single-family homes, a use that would generate limited traffic and emissions that would impact sensitive receptors. During construction of the proposed Project grading and paving activities would result in limited emissions, however as discussed above under thresholds III(b) and III(c), the proposed Project's construction emissions were below the SCAQMD's regional emission thresholds. During construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. However, due to the limited scale and the short duration of the construction activities associated with the proposed Project, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. The proposed Project would not include any sources of risk to sensitive receptors during operation. Further, the surrounding land uses are primarily multi and single-family residential and commercial with no substantial sources of TACs. Thus, future development would not cause sensitive receptors to be exposed to substantial pollutants of concern. Project-related impacts to surrounding sensitive receptors would be less than significant. No further analysis is required in the EIR.

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

Less Than Significant - The proposed Project includes the demolition of a vacant church and the construction of two new Small Lot single-family units.

Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Development of the proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402, which states the following: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." Thus, construction of the proposed Project would result in a less than significant impact relative to an odor nuisance.

According to the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries,

landfills, dairies, and fiberglass molding.¹² The proposed Project would not include any of these odor-producing uses. Furthermore, all trash receptacles would be covered and the properly maintained in a manner as to minimize odors, (as required by City and Los Angeles County Health Department regulations), and be emptied on a regular basis. Therefore, the implementations of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant and no further analysis is required in the EIR.

IV. BIOLOGICAL RESOURCES.

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

Less Than Significant - The Project Site is an infill site, developed with a 1,068 square foot vacant church located in a developed residential neighborhood in the Venice Community Plan Area. Existing vegetation on the Project Site is typical of that found in yards in urbanized residential neighborhoods in the Los Angeles area. The Project Site is not located within an environmentally sensitive habitat area, as identified in Exhibit 22 of the Venice Local Coastal Program Land Use Plan, and no sensitive species are identified in the Oakwood neighborhood in the Venice Coastal Zone Specific Plan or Venice Community Plan. Impacts would be less than significant and no further analysis is required in the EIR.

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

No Impact - The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area. Existing vegetation on the Project Site is typical of that found in yards in urbanized residential neighborhoods in the Los Angeles area. There is no riparian habitat or other sensitive natural community on the Project Site or in the surrounding area.¹³ Implementation of the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Therefore, no impact would occur, and no further analysis is required in the EIR.

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

No Impact - The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area. No watercourse or wetlands are present on the Project Site.¹⁴ No

¹² South Coast Air Quality Management District, CEQA Air Quality Handbook; Available at <http://www.aqmd.gov/ceqa/hdbk.html>, accessed June 30, 2016.

¹³ US Fish and Wildlife Service, Wetland Mapper, <https://www.fws.gov/wetlands/data/mapper.html>, accessed July 5, 2016.

¹⁴ <http://ecos.fws.gov/ipac/gettingStarted/map>, accessed June 21, 2016.

impacts to wetlands would result from the proposed Project. No further analysis is required in the EIR.

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

Less Than Significant - The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. However, a number of mature trees are scattered along the parkways surrounding the project site. Although the trees are mainly ornamental and non-native, they may provide suitable habitat, including nesting habitat for migratory birds. The proposed Project would be subject to restrictions resulting from the Migratory Bird Treaty Act (MBTA) that preclude disturbance of nesting birds. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The proposed Project would be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds, if found on the Project Site. With adherence to the MBTA requirements, less than significant impacts would occur and no further analysis is required in the EIR.

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

Less Than Significant – According to the arborist’s report completed for the proposed Project (Attachment C: Carlberg Associates, March 28, 2015) no protected trees are located on the Project Site.¹⁵ In addition, the Project Site is not located within an area covered by a conservation ordinance. The Project Site is located within the Calvo Exclusion area of the Coastal Zone.¹⁶

There are four street trees within the public right-of-way surrounding the Project Site. All of these trees are of common ornamental species; none of the trees is of a protected species as

15 LAMC Chapter IV Article 6 Section 46.01 defines protected trees as: “Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree:
(a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*).
(b) Southern California Black Walnut (*Juglans californica* var. *californica*).
(c) Western Sycamore (*Platanus racemosa*).
(d) California Bay (*Umbellularia californica*).

16 This exclusion is set forth in Public Resources Code section 30610.1, which provides that no coastal development permit shall be required for the construction of a single-family residence on any vacant lot which meets specified criteria and which is located in an area designated by the Commission. The criteria, set out in the statute, generally concern such matters as location and water supply. (Pub. Resources Code, § 30610.1, subd.(c).) The statute also provides that the Commission shall designate areas for the exclusion “if construction of single-family residences within the area has no potential, either

defined in LAMC Section 46.01. It is not known at this time if the street trees would be removed under the proposed Project. However, it is the City's Street Tree policy to require the replacement of any street trees removed during project construction. Specifically, the City's policy is to replace all significant, non-protected trees (defined as eight inches (8") in diameter at four and a half feet at a 1:1 ratio with a minimum 24-inch box size tree. Further, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan shall demonstrate the minimum replacement ratio of 1:1 for the existing, significant street trees (that would be removed) and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Following the implementation of the City's standard policies and procedures, impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant- The Project Site is located in an urbanized area and does not provide habitat for sensitive Biological Resources (see thresholds IV(a) through (d) above). The Project Site is located within the Venice Local Coastal Program Land Use Plan, but is not within an Environmentally Sensitive Habitat Area, as identified in the Plan. The proposed Project is designed to be consistent with applicable land use plans. Impacts would be less than significant and no further analysis is required in the EIR.

V. CULTURAL RESOURCES:

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

Potentially Significant – SurveyLA, a comprehensive program that identifies and categorizes significant historic resources throughout the City, has categorized the existing 1,068 square foot vacant church located on the Project Site with a status code of QQQ (additional research needed) under Criterion A/1/1 (see Attachment E). Properties that fall within the Criterion A/1/1/1 category meet the criterion for association with events that have made a significant contribution to the broad patterns of our history and cultural heritage. According to SurveyLA the former religious building on the Project Site is a:

Rare example of 1920s institutional development in the Oakwood neighborhood, an early African-American enclave in Venice. In the early 20th century, Oakwood

individually or cumulatively, for significant adverse impacts on highly scenic resources of public importance, on environmentally sensitive areas, on prime agricultural land or on agricultural lands currently in production, or on public access to or along the coast.” (Pub. Resources Code, § 30610.1 subd. (b).)

was the area in Venice where blacks were permitted to reside relatively unharrassed. Venice had a small black population dating to its founding who worked in the service industries in nearby hotels, restaurants and amusement facilities. During World War II, the local African-American population increased substantially to work at aerospace and defense industry plants in the area. This Pentecostal church may have an important association with the African-American community that historically resided in this area of Venice; however, this association could not be confirmed. More research needed to complete the evaluation. The building appeared to be vacant at the time of the survey.

Impacts to the existing vacant church are potentially significant and will be evaluated further in the EIR.

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

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

The Project Site is located in an urbanized area of the Venice Community Plan Area and has been previously disturbed and developed. No known archeological resources are present on the previously disturbed site. Construction of the proposed Project may require grading and excavation to greater depths than previously undertaken due to the three-story height of the Project and the inclusion of an approximately 7 feet by 20 feet pool. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils. In the unlikely event of an unexpected disturbance, significant impacts could occur.

The proposed Project would be subject to the numerous laws and regulations, cited below that require state, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur, such that in the event that archaeological resources are uncovered on the Project Site during grading or other construction activities, the Project Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist, to be approved by the City, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project Site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis is required in the EIR.

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

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

As discussed above under threshold V(b), the Project Site is in a developed area of the Venice Community Plan Area and has been previously disturbed and developed. No known paleontological resources or unique geological are present on the previously disturbed site. As buildout of the proposed Project may involve grading and excavation to greater depths than previously undertaken, project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the unlikely event of an unexpected disturbance, significant impacts to paleontological resources could occur.

The proposed Project would be subject to the laws and regulations cited below that require state and local agencies to consider the effects of a proposed project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining appropriate actions where potentially significant impacts may occur. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Planning Department shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist, to be approved by the City, evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis is required in the EIR.

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

Less Than Significant - The Project Site is located in an urbanized area of the Venice Community Plan Area. There are no known human remains, formal cemeteries, or areas known to have been used for disposal of historic or prehistoric human remains on the previously disturbed Project Site. Thus, while human remains are not expected to be encountered during construction of the proposed Project, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains.

In the unlikely event that human remains are uncovered during ground-disturbing activities, the proposed Project would be subject to the regulatory provisions included in the California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e) that address the handling of human remains. Pursuant to these regulations, in the event that human remain are discovered, disturbance of the site shall be halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not

subject to his or her authority and recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis is required in the EIR.

VI. GEOLOGY AND SOILS.

VI(ai). Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant – Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. As indicated by the Geotechnical Engineering Investigation (hereinafter Geotechnical Report) prepared for the Project Site, the Project Site is not located within any of the mapped Alquist-Priolo Special Studies Zones and no fault trace of any known active or potentially active fault passes through the site (Appendix D: Geotechnical Engineering Investigation, Proposed Two-Story Single Family Residence). According to the Geotechnical Report, 29 fault systems are located within a 50 mile radius of the Project Site. The faults closest to the Project Site include the Santa Monica-Hollywood fault, Newport-Inglewood fault, Malibu Coast fault, Palos Verdes fault and Elysian Park Seismic Zone.

Therefore, as the Project Site is not located within a mapped Alquist-Priolo Special Studies Zone, the potential for future on-site surface rupture is expected to be very low and impacts would be less than significant. No further analysis is required in the EIR.

VI(aii). Strong seismic ground shaking?

Less Than Significant – The Project Site is located within the seismically active Southern California region and therefore could be subject to moderate and possibly strong ground motion due to earthquakes on the Santa Monica-Hollywood fault, Newport-Inglewood fault, Malibu Coast fault, Palos Verdes fault and Elysian Park Seismic Zone.

However, the risks of exposure to strong seismic ground shaking is no greater for residents of the proposed Project, than for other residents in the Project area. Further, this impact would be reduced to a less than significant level through compliance with all relevant California Building Code (CBC) regulations, the City of Los Angeles International Building Code (IBC) seismic standards, as well as the recommendations included in the Geotechnical Report, as required by the City of Los Angeles Department of Building and Safety (LADBS).

Compliance with existing laws regarding the risk of loss, injury, or death from strong seismic ground shaking would reduce potential impacts to less than significant levels. No further analysis is required in the EIR.

VI(aiii). Seismic-related ground failure, including liquefaction?

Less Than Significant – Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

While the Site is characterized as being subject to liquefaction,¹⁷ as stated in the Geotechnical Report, “Based on the findings of the faulting and seismicity evaluation, it is our opinion that the occurrence of earthquake-induced geologic hazards such as lurching, shallow ground rupture, landslide and liquefaction within the site is unlikely.” (Page 7, C.Y. Geotech, Inc., February 16, 2015). Further, compliance with all relevant CBC and the City of Los Angeles UBC seismic standards, as well as the recommendations of the Geotechnical Report would ensure that potential impacts would be reduced to less than significant levels. No further analysis is required in the EIR.

VI(aiv). Landslides?

No Impact – Landslides are movement of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Site and surrounding areas are generally flat and there are no major slopes or buffs.

According to the Geotechnical Report, the Project Site is not subject to earthquake-induced landslides or lateral spreading (Page 7, C.Y. Geotech, Inc., February 16, 2015). Therefore, no impacts resulting from landslides would occur and no further analysis is required in the EIR.

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

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

The Project Site is located in an urbanized area of the Venice Community Plan Area and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site. The proposed Project would include the construction of two Small Lot single-family dwelling units with landscaped and hardscaped areas, and would not contain large amounts of exposed soil. Following completion of construction of the proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

¹⁷ ZIMAS, Parcel Profile Report, 3/10/2016, Attachment A

Construction of the proposed Project would involve soil disturbance activities, including excavation and grading for the pool that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, construction activities associated with the proposed Project would be subject to local and state erosion control and grading regulations, including but not limited to, grading permits and haul route approval from the LADBS. These regulations are in place to limit potential erosion impacts to acceptable levels. In addition, the proposed Project would be required to comply with standard regulations, including SCAQMD Rule 402, which would reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant. No further analysis is required in the EIR.

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

Less Than Significant – See thresholds VI(aiii) and VI(aiv). As previously discussed, the Project Site is not subject to landslides, lateral spreading, and/or liquefaction. The proposed Project would comply with all recommendations included in the Geotechnical Report, would be designed and constructed in conformance with the CBC, as well as the Los Angeles UBC requirements and other regulations designed to protect occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction, or collapse would reduce potential impacts to less than significant levels. No further analysis is required in the EIR.

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

Less Than Significant – Based on soil classifications and laboratory tests results performed during the preparation of the Geotechnical Report, on-site soils were found to have low to very low expansion indexes (Page 4, C.Y. Geotech, Inc., February 16, 2015). Further, as described above, the proposed Project would be designed and constructed in conformance with the CBC requirements and in conformance with the Los Angeles UBC. Impacts would be less than significant and no further analysis is required in the EIR.

VI(e). Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are no available for the disposal of wastewater?

No Impact – The Project Site is currently served by the City of Los Angeles wastewater system. The proposed Project would connect to the existing sewer mainlines and service lines, which are currently available in the surrounding roadways. The proposed Project would not require the use of septic systems. Impacts would be less than significant and no further analysis is required in the EIR.

VII. GREENHOUSE GAS EMISSIONS.

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

Less Than Significant - “Greenhouse gases” (GHG), so called because of their role in trapping heat near the surface of the earth) emitted by human activity are implicated in global climate change, commonly referred to as “global warming.” These greenhouse gases contribute to an increase in the temperature of the earth’s atmosphere by transparency to short wavelength visible sunlight, but near opacity to outgoing terrestrial long wavelength heat radiation. The principal GHGs include carbon dioxide (CO₂), methane, and nitrous oxide. Collectively GHGs are measured as carbon dioxide equivalent (CO₂e).

Fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. Industrial and commercial sources are the second largest contributors of GHG emissions with about one-fourth of total emissions.

California has passed several bills and the Governor has signed at least three executive orders regarding greenhouse gases. GHG statues and executive orders (EO) include Assembly Bill (AB) 32, Senate Bill (SB) 1368, EO S-03-05, EO S-20-06 and EO S-01-07. AB 32, the California Global Warming Solutions Act of 2006, is one of the most significant pieces of environmental legislation that California has adopted. Most notably AB 32 mandates California’s GHG emissions be reduced to 1990 levels by 2020.

The SCAQMD has published a “Draft Guidance Document – Interim CEQA GHG Significance Threshold”. This document establishes a five-tiered process for evaluating the GHG impacts of a project. Tier 1 involves determining if the project qualifies for a CEQA exemption. If the project is not exempt, Tier 2 involves determining whether the project is consistent with an adopted GHG reduction plan that might be part of a local general plan. Under the SCAQMD’s “Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold” if a City has not adopted a Climate Action Plan a Tier 3 GHG analysis is conducted.

In September 2010, the SCAQMD’s GHG CEQA Significance Threshold Working Group released the following recommended Tier 3 threshold and analysis recommendations, which are commonly used for CEQA analysis of greenhouse gas emissions in the SCAQMD when a project is not covered by a Tier 2 GHG reduction plan:

- Project-related construction emissions should be amortized over 30 years and should be added back to the Project’s operational emissions.
- 3,000 MTCO₂e per year for all land use types; or
- 3,500 MTCO₂e per year for residential
- 1,400 MTCO₂e per year for commercial, or
- 3,000 MTCO₂e per year for mixed-use projects.

The proposed Project would generate limited construction GHG emissions, which when amortized over 30 years, are negligible. The CalEEMod 2013.2.2 model was used to estimate the construction-related CO₂ emissions. The proposed Project’s construction activities would generate approximately 64.8 MTCO₂e per year and Project operation activities would generate approximately 43.5 MTCO₂e per year (Refer to Attachment B).

Thus, the proposed Project's GHG emissions do not exceed the 3,500 MTC02e/year threshold, impacts would be less than significant. No further analysis is required in the EIR.

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

Less Than Significant - In response to concern regarding GHGs and global climate change, the state passed Assembly Bill 32 (AB 32) also known as the California Global Warming Solutions Act of 2006. AB 32 (Health and Safety Code Section 38500 et. seq) mandated a reduction in the state's GHG levels. AB 32 is the basis for reduction of GHG emissions in California. Local agencies such as the SCAQMD base their planning and regulations on the requirements included in AB 32, which include a reduction of GHG emissions to 1990 rates by 2020. The SCAQMD adopted the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32.

The Project Site is within the jurisdiction of the SCAQMD. As the net emissions associated with the proposed Project would be well below the SCAQMD thresholds, the proposed Project would not conflict with plans, policies, or regulations for reducing GHG emissions. As a result, the proposed Project would not conflict with the state's ability to meet its GHG goals under AB 32.

In addition, Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and a sustainable communities strategy that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multi-modal transportation options, and identifying land use strategies that focus new housing and job growth in areas served by public transit. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. Development of the proposed Project would develop the Project Site with two Small Lot single-family units. As the proposed Project would not result in a substantial population increase, there would be no significant increase in travel distance or vehicle miles traveled, compared to existing conditions. Impacts would be less than significant and no further analysis is required in the EIR

VIII. HAZARDS AND HAZARDOUS MATERIALS.

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

Less Than Significant – A significant impact would occur if the proposed Project would create a significant hazard through the routine transfer, use, or disposal of hazardous materials. Construction of the proposed Project would involve the use of those hazardous materials that are typically necessary for construction of a single-family unit (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the proposed Project would involve the routine transport, use, and disposal of these types of hazardous materials throughout the duration of the construction period. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. Therefore, the proposed Project

would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The proposed Project consists of the construction of two Small Lot single-family homes and does not involve the routine transport, use, or disposal of hazardous materials. The types of hazardous materials associated with routine, day-to-day operation of the proposed Project would include small amounts of pesticides, fertilizers, pool related chemicals, and cleaning agents required for normal maintenance of landscaping and the facilities. All potentially hazardous materials stored on site for daily upkeep would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations. The small quantity and compliance with existing local, state, and federal regulations would ensure the transport and storage of these materials would not pose a significant hazards to the public or the environment. Project-related impacts would be less than significant. No further analysis is required in the EIR.

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

Less Than Significant – As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to the transport, storage, and disposal of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

The Project Site is located in a Methane Buffer Zone. The two Small Lot single-family homes would be designed to comply with the requirements and standards established by the City, and applicable City building codes. Thus, the proposed Project would be designed to ensure that methane hazards would be less than significant.

The existing 1,068 square foot church located on the Project Site was constructed prior to 1978, and thus may contain lead-based paints (LBPs) and/or asbestos containing materials (ACMs). If not properly abated, the demolition of the existing vacant church could accidentally release hazardous materials, and as such, could create a public health risk. Development of the proposed Project would be required to comply with SCAQMD Rule 1403 which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and renovation activities. California Code of Regulations (CCR) Title 8, Section 1532 et seq. requires that all LBPs be abated and removed by a licensed lead contractor. Further, as stated above, development that occurs within the Project Site would be required to comply with existing local, state, and federal regulations to mitigate potential hazardous conditions on the site and in the surrounding area. Compliance with the existing regulations would ensure impacts would be less than significant. No further analysis is required in the EIR.

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

Less Than Significant – There are two schools located within approximately a quarter-mile of the Project Site, including Westminster Elementary School, located 0.4 miles west of the Project Site, and Ecole Clair Fontaine School, located 0.3 miles west of the Project Site.

As previously discussed, construction of the proposed Project would involve the use of those hazardous materials that are typically necessary for construction of single-family units (e.g.,

paints, building materials, cleaners, fuel for construction equipment, etc.). In addition, due to the age of the existing structures, the presence of ACMs and LBPs is likely. However, demolition of the existing structures, as well as the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. Construction related activities would be less than significant.

Operation of the proposed Project would require a small quantity of hazardous materials/chemicals to be transported to and used on the Project Site (e.g., for landscaping, pool maintenance, and cleaning purposes). Such products would only be considered hazardous if used inappropriately or if exposed to unfavorable conditions. All potentially hazardous materials transported, stored, and used on-site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment.

As the proposed Project would comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the proposed Project is not expected to adversely affect Westminster Elementary School and/or Ecole Clair Fontaine School or other school facilities. Impacts would be less than significant and no further analysis is required in the EIR.

VIII(d). Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant – California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. 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.

According to the EnviroStor and GeoTracker databases, the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Impacts would therefore be less than significant. No further analysis is required in the EIR.

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

No Impact – The Project Site is not located within an airport land use plan. Los Angeles International Airport is located approximately 7 miles from the Project Site. The Project Site is located approximately 1.4 miles southwest from the end of the Santa Monica Municipal Airport runway. However, it is not within the airport influence area or airport runway protection

zone (RPZ) and inner safety zone.¹⁸ The Project Site is therefore not within an airport hazard zone. Airport-related hazards would be less than significant. No further analysis is required in the EIR.

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

No Impact – See threshold VIII(e), above. No further analysis is required in the EIR.

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

Less Than Significant – Under the proposed Project the existing structures located on the Project Site would be demolished and two new Small Lot single-family units would be developed on the site. The Project Site is not located along a designated disaster route.¹⁹ Further, neither the construction nor the operation of the proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction traffic would conform to all access standards to allow adequate emergency access. The majority of construction activities for the proposed Project would be confined to the Project Site, except for the infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

Two new driveways would be provided along 6th Avenue and would provide access for residents. While originally proposed along San Juan Court (the alley that abuts the Project Site), LADOT has requested that the driveways be constructed along 6th Avenue due to the alley width constrictions. The design of the proposed Project would not cause a permanent alteration to the local vehicular circulation routes and patterns, or impede public access or travel on any public right-of-way. In addition, the Project Applicant would be required to submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE), and LADOT to ensure compliance with all applicable code-required site access and circulation requirements, including code-required emergency access.

Thus, construction and operation activities associated with the proposed Project are not anticipated to significantly impair implementation of, or physically interfere with, any adopted or emergency response or evacuation plans of a local, state, or federal. Impacts would be less than significant and no further analysis is required in the EIR.

VII(h). Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant - The Project Site is located in a developed neighborhood and does not contain any wildlands or urbanized areas intermixed with wildlands (ZIMAS Report Attachment A). Further, the proposed Project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of automatic smoke detectors.

¹⁸ <http://planning.lacounty.gov/assets/obj/anet/Main.html>.

¹⁹ City of Los Angeles, September 1996, (General Plan Safety Element, Exhibit H; Critical Facilities and Lifeline Systems).

Therefore, potential impacts from wildland fires would be less than significant. No further analysis is required in the EIR.

IX. HYDROLOGY AND WATER QUALITY.

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

Less Than Significant - Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

The proposed Project is located within the City of Los Angeles which is within the greater Los Angeles River watershed, and thus, within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP). This SQMP is designed to ensure stormwater achieves compliance with receiving water limitations. Thus, stormwater generated by a development that complies with the SQMP does not exceed the limitations of receiving waters, and thus does not exceed water quality standards.

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated cities therein, including the City of Los Angeles, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the County-wide MS4 permit, all new developments must comply with the SQMP. In addition, as required by the MS4 permit, the City of Los Angeles has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with SQMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the project will comply with the City's SUSMP.

Under the proposed Project the site would be developed with two new Small Lot single-family units. The proposed use is not a point source generator of water pollutants, and thus, no quantifiable water quality standards apply to the proposed Project. The proposed Project would add typical, urban, nonpoint-source pollutants to storm water runoff. As discussed, these pollutants are permitted by the County-wide MS4 permit, and would not exceed any receiving water limitations.

Depending on the type of project, either a SUSMP or *Low Impact Development Ordinance* (LID) compliance is required by the City of Los Angeles to reduce the quantity and improve the quality of rainfall runoff that leaves the site. The proposed Project includes construction of two Small Lot single-family units. Although the proposed Project involves construction on a more than half of the 5,005 square foot site, it is not located in the vicinity of an

Environmentally Sensitive Area (ESA). The proposed Project is therefore not one of the types of projects requiring preparation of a SUSMP.²⁰

The proposed Project is however subject to the City's LID Ordinance. "The LID ordinance requires rainwater from a three-quarter inch rainstorm to be captured, infiltrated and, or used, onsite at most developments and redevelopments where more than 500 square feet of hardscape is added. Most single family units can comply in a more simple way by installing adequate Best Management Practices (BMPs) such as rain barrels, permeable pavement, rainwater storage tanks, or infiltration swales to contain the water."²¹ The City's LID Handbook provides more information about acceptable BMPs. The proposed Project would be required to comply with the City's LID Ordinance and therefore, would conform to all requirements of the RWQCB and the LAMC and would not result in un-permitted discharges into the sanitary sewer and stormwater systems. Therefore, the proposed Project would not violate any water quality standards or waste discharge requirements, and would have less than significant water quality impacts. No further analysis is required in the EIR.

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

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

The Project Site is not located within a designated sole-source aquifer,²² nor would it adversely affect groundwater quality or recharge as the Project Site is an infill site with existing uses, and is largely impermeable. The proposed Project would not install any groundwater wells, and would not otherwise directly withdraw any groundwater. In addition, there are no known aquifer conditions at the Project Site or in the surrounding area, which could be intercepted by the limited excavation required for the proposed Project. Therefore, the proposed Project would not physically interfere with any groundwater supplies. Additionally, water usage associated with operation of the proposed Project would be supplied by the Los Angeles Department of Water and Power (DWP) and would not be supplied by drawing on any aquifer within the Project area. Project groundwater impacts are therefore considered less than significant. No further analysis is required in the EIR.

20 LA Watershed Protection Program,
<http://www.lastormwater.org/siteorg/businesses/susmp/susmpintro.htm>, accessed September 13, 2016.

21 LA Watershed Protection Program,
<http://www.lastormwater.org/siteorg/businesses/susmp/susmpintro.htm>, accessed September 13, 2016.

22 USEPA, Pacific Southwest Region 9, Sole Source Aquifer,
<https://www3.epa.gov/region9/water/groundwater/ssa.html>, accessed June 21, 2016.

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

Less Than Significant – A significant impact would occur if the proposed Project substantially altered the drainage pattern of the Project Site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. The Project Site topography is generally level. There are no natural watercourses on the Project Site or in the vicinity of the Project Site.²³ As stated previously, the Project Site is developed with a 1,068 square foot vacant church. During a storm event stormwater runoff flows to the local storm drain system.

The proposed Project would be required to comply with the City's LID Ordinance and implement BMPs to reduce runoff and preserve water quality during construction of the proposed Project. Further, the proposed Project would be required to implement an LID Plan (during the proposed Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the proposed Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis is required in the EIR.

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

Less Than Significant – As discussed above under threshold IX(c), implementation of the proposed Project is not anticipated to substantially change the drainage pattern on the Project Site. The Project Site topography is level. It is not located in proximity to a stream or watercourse.²⁴ It is not located in a flood zone.²⁵ In addition, the Project Applicant would be required to implement an LID Plan, thus the proposed Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site. Impacts would be less than significant and no further analysis is required in the EIR.

IX(e). Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant – A proposed Project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain

²³ <http://ecos.fws.gov/ipac/gettingStarted/map> accessed June 21, 2016 and ZIMAS Parcel Profile Report, 3/10/2016, Attachment A

²⁴ Ibid.

²⁵ Los Angeles County Flood Zone Determination Website, <http://dpw.lacounty.gov/wmd/floodzone/> accessed June 21, 2016 and ZIMAS Parcel Profile Report, accessed March 10, 2016, Attachment A.

system serving the Project Site. A project-related significant adverse effect would also occur if the proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

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

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Project Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage/carport could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB and the proposed Project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. No further analysis is required in the EIR.

IX(f). Otherwise substantially degrade water quality?

Less Than Significant – A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources discussed above, as described in under thresholds IX(a) through IX(e), the proposed Project does not include additional sources of contaminants which could potentially degrade water quality.

The proposed Project's construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with the City grading regulations, the proposed Project's construction impacts

related to water quality would be less than significant. No further analysis of this issue is required in the EIR.

During the proposed Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the proposed Project would meet the City's water quality standards. Therefore, project impacts related to operational water quality would be less than significant. No further analysis is required in the EIR.

IX(g). Place housing within a 100-year flood hazard areas mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Less Than Significant –The Project Site is not located in a 100-year flood zone area as mapped by the Federal Management Agency (FEMA).²⁶ The proposed Project would therefore not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Flood-related impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant – See threshold IX(f) above. The Project Site is not within a flood zone.²⁷ The proposed Project would not place structures within a 100-year flood hazard area and would not impede or redirect flood flows. Flood-related impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant – As the Project Site is not within a flood zone, development of the proposed Project would not expose people or structures to a significant risk of loss injury or death involving flooding, including flooding as a result of the failure of a levee or dam. ²⁸ As such, impacts would be less than significant and no further analysis is required in the EIR.

IX(j). Inundation by seiche, tsunami, or muflow?

No Impact – According to the Tsunami Inundation Map for Emergency Planning for the Venice Quadrangle dated March 1, 2009,²⁹ the Project Site is located just outside of the identified

²⁶ Los Angeles County Flood Zone Determination Website, <http://dpw.lacounty.gov/wmd/floodzone/> accessed June 21, 2016 and ZIMAS Parcel Profile Report, accessed March 10, 2016, Attachment A.

²⁷ Ibid.

²⁸ Ibid.

²⁹ Department of Conservation, Los Angeles County Tsunami Inundation with USGS 24K Quads, http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/, accessed September 26, 2016.

tsunami inundation area. Tsunami-related impacts are therefore anticipated to be less than significant.

A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. No water bodies are on or adjacent to the Project Area that would impact the proposed Project. Impacts would be less than significant

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

X. LAND USE AND PLANNING.

X(a). Physically divide an established community?

No Impact – The Project Site is located within the Venice Community Plan Area, as established by the City’s General Plan. A 1,068 square foot vacant church is located on the Project Site. The land uses within the general vicinity of the Project Site are characterized by a mix of multi and single-family units. The Project Site is an infill site that would be developed with two detached three-story Small Lot single-family dwelling units and does not include elements that would not physically divide an established community. No impact would occur and no further analysis is required in the EIR.

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

Less Than Significant – The Project Site is zoned RD1.5-1. The General Plan land use designation for the Project Site is Low Medium II Residential. The proposed Project has been designed to be consistent with the requirements of the LAMC, zone designation, 2014 Small Lot Design Guidelines, Venice Community Plan, Venice Coastal Zone Specific Plan, Venice Local Coastal Program Land Use Plan, and the Los Angeles Transportation Corridor Specific Plan. The Project Applicant is proposing to construct two detached Small Lot single-family units on the Project Site. As such, a Parcel Map to permit the subdivision of the Project Site into two new recorded lots is being requested in order to accommodate the propose Project. In addition, the Project Applicant is requesting the following entitlements:

- A Costal Development Permit to allow for the demolition of the existing 1,068 square foot vacant church building and the construction of two detached Small Lot single-family units in the single-jurisdiction coastal zone.
- A Project Permit Compliance to determine whether or not the proposed Project is in conformance with the regulation of the Venice Coastal Zone Specific Plan.

With approval of the discretionary entitlements, impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant - As previously stated above under threshold IV(f), the Project Site is not located within the confines of a Habitat Conservation Plan, Natural Community Conservation Plan, or SEA. The Project Site is located within the Venice Coastal Zone Specific Plan Area, but is not within an Environmentally Sensitive Habitat Area (ESHA), as identified in that Plan and as discussed under threshold IV(f). Thus, the proposed Project would not conflict with the provisions of an applicable habitat conservation plan or natural community conservation plan. Impacts would be less than significant and no further analysis is required in the EIR.

MINERAL RESOURCES.

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

No Impact– See discussion under threshold XI(b), below.

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

No Impact– Under the proposed Project the existing structure located on the Project Site would be demolished and two detached Small Lot single-family units would be constructed on the Project Site. The Project Site is located in a developed residential neighborhood in the Venice Community Plan Area of the City of Los Angeles. The Project Site is zoned RD1.5-1, and thus is not zoned for oil extraction and drilling, or mining of mineral resources,³⁰ as there are no such sites at the Project Site. Further, the Project Site is not located in an identified Mineral Resource Zone.³¹

Thus development of the proposed Project would not result in the loss of availability of a mineral resource that would be a value to the residents of the state, or locally-important mineral resources, or a mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact to mineral resources would occur and no further analysis is required in the EIR.

XII. NOISE.

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

Less Than Significant - The proposed Project consists of the demolition of the existing 1,068 square foot vacant church on the Project Site and the construction of two new detached Small Lot single-family units. The Project Site is level and located in a developed residential neighborhood in the Venice Community Plan Area. Standard construction techniques would

³⁰ Sites with known mineral resources are generally known as Mineral Resource Zones (MRZ), as classified by the California Geologic Survey.

³¹ City of Los Angeles, Conservation Element Exhibit A, Mineral Resources Map, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed September 12, 2016.

be used for demolition and construction. No unusual circumstances are present on the Project Site that would result in the use of construction techniques that generate high levels of noise such as pile driving. All construction would be conducted in accordance with applicable City of Los Angeles Municipal Code requirements regarding construction noise and limitations on the hours of construction. No construction would occur during nighttime hours. Construction and demotion shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday; demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels; and the Project contractor shall be required to use power construction equipment with state-of-the-art noise shielding and muffling devices. Construction noise impacts are therefore anticipated to be short-term and less than significant.

On-site operational activities, such as outdoor use of open space, mechanical systems, and vehicle use would not generate a substantial amount of noise and thus would not result in significant impacts to the existing residences adjacent to the Project Site. No further analysis is required in the EIR.

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

Less Than Significant – Development of the proposed Project has the potential to generate groundborne vibration/groundborne noise levels.

Groundborne vibration from construction activities rarely reach the levels that damage structures. The Federal Transit Administration (FTA)³² and Caltrans³³ have published standard vibration velocities for construction equipment operations. The reference vibration levels (peak particle velocities, PPV) for construction equipment pieces anticipated to be used during single-family construction activities are listed in **Table 7, Vibration Levels for Construction Equipment**. The primary and most intensive vibration source associated with future development would be the use of large bulldozers and loaded haul trucks. Bulldozers would be used to move dirt and materials around at the Project Site. As indicated in **Table 7** loaded trucks and large bulldozers are capable of producing vibration levels of approximately 0.076 and 0.089 PPV, respectively, at 25 feet from the source, which is below the FTA threshold of 0.2 PPV for non-engineered masonry and other structures; therefore, construction activities would not result in significant vibration impacts to off-site sensitive receptors.

Table 7: Vibration Levels for Construction Equipment	
Equipment	PPV at 25 ft. (in/sec)
Loaded Truck	0.076
Large Bulldozer	0.089

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, (2006) 12-9.

32 According to FTA guidelines, the vibration threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec peak particle velocity (PPV) and 0.5 in/sec PPV for reinforced concrete, steel, or timber buildings.

33 For continuous (or steady-state) vibrations, Caltrans considers the architectural damage risk level to be 0.1 PPV for fragile buildings, 0.25 PPV for historic buildings, 0.3 PPV for older residences, and 0.5 PPV for new residences. For long-term exposure to continuous vibration, Caltrans identifies a threshold for strong human perception at 0.10 PPV and 0.04 PPV as a threshold for distinct human perception.

All mechanical (e.g., HVAC equipment) and other on-site operational point sources associated with operation of the proposed Project would not produce any perceptible vibration. While there are no FHWA standards for traffic-related vibrations, off-site vibration from motor vehicles and any occasional light, medium, or heavy-duty trucks traveling to and from the Project Site would not be perceptible along roadways of travel.³⁴ Thus, vibration impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant - The proposed Project consists of the construction and operation of two new Small Lot single-family homes. The limited number of project generated trips and the normal sounds associated with residential living are not sufficient to result in a substantial increase in ambient noise levels. Impacts are anticipated to be less than significant. Thus, permanent ambient noise impacts would be less than significant and no further analysis is required in the EIR.

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

Less Than Significant – As discussed in threshold XII(c) above, under the proposed Project the existing 1,068 square foot vacant church located on the Project Site would be demolished and replaced with two new detached Small Lot single-family units. Typical construction activities that occur pursuant to the proposed Project have the potential to result in a temporary or periodic increase in ambient noise levels. No unusual circumstances are present on the Project Site that would require the use of construction practices that generate high levels of noise such as pile driving. While construction of the proposed Project would generate a short-term increase in the ambient noise level, these increases would occur during daytime hours and would only be permitted during the hours of Monday through Friday 7:00 a.m. to 9:00 p.m. and Saturday 8:00 a.m. to 6:00 p.m. As all construction would be conducted in accordance with applicable LAMC requirements regarding construction noise, construction noise impacts would be short-term and less than significant. No further analysis is required in the EIR.

As stated above, the proposed Project would redevelop the Project Site with two detached Small Lot single-family units. Daily noises associated with residential development including people's voices, car doors being closed, mechanical equipment etc., would occur. Given the nature and location of the proposed Project, operation of the Project would not result in a substantial and/or temporary increase in ambient noise levels in the Project area. No further analysis is required in the EIR.

³⁴ US Department of Transportation, Federal Transit Administration, Office of Planning and Environment, Transit and Vibration Impact Assessment, FTA-VA-90-1003-06, May 2006.

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

Less Than Significant – The Project Site is not located within an airport land use plan and/or within an airport noise contour area.³⁵ The Project Site is located approximately 7 miles north of Los Angeles International Airport and approximately 1.4 miles southwest from the end of the Santa Monica Municipal Airport runway. Airport-related noise impacts would be less than significant. No further analysis is required in the EIR.

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

No Impact - The Project Site is not located within the vicinity of a private airstrip. See threshold XII(e) above. No impact would occur and no further analysis is required in the EIR.

XIII. POPULATION AND HOUSING.

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

Less Than Significant – Under the proposed Project the existing vacant church located on the Project Site would be demolished and replaced with two new detached Small Lot single-family units. The proposed number of new homes is not sufficient to induce substantial population growth. The proposed Project is consistent with existing zoning and General Plan land use designations for the Project Site and is therefore growth accommodating, rather than growth inducing. Impacts would be less than significant and no further analysis is required in the EIR.

- XIII(b). Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

No Impact - Under the proposed Project the existing vacant church located on the Project Site would be demolished and replaced with two new detached Small Lot single-family units. As the current structure is vacant no housing is being displaced. The proposed Project instead results in a net increase in housing. No impact would occur. No further analysis is required in the EIR.

- XIII(c). Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact – See response to threshold XIII(b) above. No displacement of persons would occur and thus no displacement impacts would result. No further analysis is required in the EIR.

³⁵ Los Angeles County A-Net site: <http://planning.lacounty.gov/assets/obj/anet/Main.html>, accessed September 12, 2016.

XIV. PUBLIC SERVICES.

XIV. **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:**

XIV(a). Fire Protection?

Less Than Significant – The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact fire services, because:³⁶

- The Project Site is located less than 1.5 miles from an engine or truck company.
- The Project Site is not located in a brush fire hazard area, hillside, or area with inadequate fire hydrant service or street access.
- The proposed Project does not involve the use, manufacture or storage of toxic, readily combustible, or otherwise hazardous materials.
- The location of the proposed Project allows for adequate emergency access (e.g., adequate street/fire lane width--minimum 20 feet clear and unobstructed with an approved turn around, grade not exceeding 15 percent, dead-ends not exceeding 700 feet).
- There are no street intersections with a level of service (LOS) of E or F near the Project Site that would adversely impact response time. (Refer to threshold XVI (a)).

Under the proposed Project the existing 1,068 square foot vacant church located on the Project Site would be demolished and replaced with two new detached Small Lot single-family units. As discussed in threshold XIII (a), above, future development of the proposed Project would result in a minimal population increase. The City of Los Angeles Fire Department (LAFD) is responsible for providing fire and emergency services to the Project Site. The nearest fire station to the Project Site is Station 63, located at 1930 Shell Avenue in Venice, less than a half-mile from the Project Site. The proposed Project is consistent with existing zoning and Venice Community Plan land use designations for the Project Site. As the projected population increase is minimal, LAFD Station 63 would continue to be able to serve the Project Site and would not require additional staffing. Impacts to fire and emergency services would be less than significant. No further analysis is required in the EIR.

XIV(b). Police Protection?

Less Than Significant - The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact police services, because:³⁷

- The proposed Project would not result in a net increase of 75 residential units, 100,000 square feet (sf) of commercial floor area, or 200,000 sf of industrial floor area.

³⁶ CEQA Thresholds Guide, City of Los Angeles, 2006. Page K2-2, L.A., <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

³⁷ L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page K1-1, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

Under the proposed Project a 1,068 square foot vacant church located on the Project Site would be demolished and replaced with two new detached Small Lot single-family units. The Los Angeles Police Department (LAPD) is responsible for providing police protection services to the Project Site. As discussed under threshold XIII(a) above, development of the proposed Project would result in a minimal population increase. The closest police stations to the Project Site is the Venice Beach Substation at 1530 West Ocean Front Walk, Los Angeles, CA 90291, which is located approximately 0.6 miles from the Project Site. As the projected population is minimal, the LAPD would continue to be able to serve the Project Site and would not require additional staffing. Impacts to police services would be less than significant and no further analysis is required in the EIR.

XIV(c). Schools

Less Than Significant - The City of Los Angeles collects a school impact fee from new residential developments.³⁸ By law, payment of the fee constitutes full mitigation for any school impacts due to new development. In addition, as discussed under threshold XIII(a), above, development of the proposed Project would result in a minimal population increase within the Venice Community Plan Area. School impacts would therefore be less than significant. No further analysis is required in the EIR.

XIV(d). Parks?

Less Than Significant – The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact park services, because:³⁹

- The proposed project would not result in a net increase of 50 or more residential units that would adversely impact recreation and park services and/or facilities due to the project's proximity to, or expected usage of, those facilities or services.

A significant impact would occur if the proposed Project resulted in substantial population growth that would generate a demand for recreation and park services. Under the proposed Project the existing 1,068 square foot vacant church would be demolished and two new Small Lot single-family units would be constructed on the Project Site. "Pursuant to LAMC Section 17.12, most residential development projects requesting a subdivision or a zone change are required, as a condition of approval of the project, to either dedicate land for recreation and park purposes or pay a fee in-lieu (Quimby Fees). The in-lieu fee is calculated on a per unit (for condominiums) or per lot basis, with the amount of the fee dependent on the zoning of property."⁴⁰ As of March 1, 2016 the Quimby Fee for Project Sites zoned RD is \$4,188 per dwelling unit. The Project Applicant would be required to pay the adopted Quimby Fee prior to operation of the proposed Project.

38 <http://www.hcd.ca.gov/housing-policy-development/pay-to-play/langels.pdf>, accessed September 26, 2016.

39 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page K4-2, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

40 City of Los Angeles Department of Recreation and Parks, Quimby Fees, <http://www.laparks.org/planning/quimby-park-fees>, accessed September 13, 2016.

Further, as discussed above, the increase in population would be minimal and thus would not significantly impact park and recreation facilities. Therefore, development of the proposed Project would not lead to an increase in the usage of recreation and park facilities in the surrounding community, or a need for additional recreation and park facilities.

Impacts to park and recreation facilities would be less than significant and no further analysis is required in the EIR.

XIV(e). Other Public Facilities?

Less Than Significant – A significant impact would occur if the proposed Project generates substantial population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project area. In the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services. LAPL provides services at the Central Library, eight Regional Branch Libraries, and 64 Community Branch Libraries.

As there would not be a substantial increase in population associated with the proposed Project, there would be no need for additional library resources or facilities. Impacts would be less than significant and no further analysis is required in the EIR.

XV. RECREATION.

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

Less Than Significant – See response to threshold XIV(d), above.

XV(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant – See response to threshold XIV(d), above.

XVI. TRANSPORTATION/TRAFFIC.

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

Less Than Significant – Under the proposed Project the existing 1,068 vacant church located on the Project Site would be demolished and replaced with two new Small Lot single-family units. During the construction phase, the proposed Project would be required to comply with the City's LADBS Haul Route Good Neighbor Policies (See LAMC 91.106.4.8). Thus, impacts to the surrounding area from construction traffic (e.g., haul truck trips, construction worker trips, delivery trucks, and refuse trucks) would be less than significant.

According to the Institute of Transportation Engineers (ITE) Trip Generation manual, two Small Lot single-family units are estimated to generate 1.5 a.m. peak hour trips, 2 p.m. peak hour trips and 20 daily trips.⁴¹ The proposed Project is consistent with existing zoning and Community Plan land use designations for the Project Site. The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact transportation facilities, because:⁴²

- The proposed Project would not generate and/or cause a diversion or shift of 500 or more daily trips or 43 or more p.m. peak hour vehicle trips on the street system.
- The proposed Project would not generate more than 120 daily vehicle trips to a local residential street.

Impacts to the circulation system would be less than significant and no further analysis is required in the EIR. (Refer to threshold XVI(b), below).

XVI(b). Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant – The Los Angeles County congestion management program (CMP) was issued by the Los Angeles County Metropolitan Transportation Agency in 2010. All freeways, tollways, and selected arterial roadways in the County are part of the CMP Highway System. The CMP Traffic Impact Analysis (TIA) Guidelines require that intersection monitoring locations must be examined if a project will add 50 or more trips during either the a.m. or p.m. weekday peak hours. As discussed under threshold XVI(a) above, the proposed Project is estimated to generate 1.5 a.m. peak hour trips, 2 p.m. peak hour trips and 20 daily trips.

Further, the proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact transportation facilities, because:⁴³

- The proposed Project would not add 150 or more one-way vehicle trips to a CMP mainline freeway monitoring segment during either the a.m. or p.m. peak hours.
- The proposed Project would not add 50 or more a.m. or p.m. peak hour trips to a freeway on- or off-ramp.

Thus, traffic volumes in conjunction with development of the proposed Project would not meet the CMP TIA Guidelines requiring intersection monitoring. Impacts would be less than significant and no further analysis is required in the EIR.

41 ITE Trip Generation Rate 210 – Single Family Home, Institute of Transportation Engineers, Trip Generation, 6th Edition, Volume 1. A copy of the rates is available on-line at: <http://planning.lacity.org/eir/CanyonHillsProject/CanyonHillFEIR/Appendices/Appendix%20D/ITE%20Information.pdf>, accessed September 26, 2016.

42 CEQA Thresholds Guide, City of Los Angeles, 2006. Page L.2-2, L.2-2, and L4-1, L.A., <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

43 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page L.3-2, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

XVI(c). Result in a chance in air traffic patterns, including either an increase in traffic levels or a chance in location that results in substantial safety risks?

No Impact – Under the proposed Project the existing 1,068 square foot vacant church would be demolished. Two detached Small Lot single-family units would be constructed on the Project Site. Both Small Lot single-family units would be three stories and 29 feet tall. The Project Site is not located within an airport land use plan area, therefore no change in air traffic patterns, including either an increase in traffic levels or a change in location would occur. No impact would occur and no further analysis is required in the EIR.

XVI(d). Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant - The proposed Project does not contain any features that would substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Traffic safety impacts are therefore anticipated to be less than significant. No further analysis is required in the EIR. (See also threshold XVI(a), above).

XVI(e). Result in inadequate emergency access?

Less Than Significant – As discussed under threshold VIII(g) above, the Project Site is not located along a designated disaster route.⁴⁴ Further, neither the construction nor the operation of the proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. In addition, the proposed Project's construction activities would be confined to the Project Site, an infill site located in a residential neighborhood, and required to conform to all applicable regulations that address emergency access. Impacts would be less than significant and no further analysis is required in the EIR.

XVI(f). Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant – Under the proposed Project the existing 1,068 square foot vacant church located on the Project Site would be demolished and two new Small Lot single-family units would be constructed on the Project Site. The proposed Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities. Impacts would be less than significant and no further analysis is required in the EIR.

XVII. UTILITIES AND SERVICE SYSTEMS.

XVII(a). Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant – Wastewater generated in the City is treated at the Hyperion Treatment Plant in Playa del Rey. The Regional Water Quality Control Board (RWQCB) regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering

44 City of Los Angeles, September 1996, (General Plan Safety Element, Exhibit H; Critical Facilities and Lifeline Systems).

to RWQCB regulations as they apply to wastewater generated by the proposed Project. Operation of the proposed Project could increase the amount of wastewater that would need to be treated at the Hyperion Treatment Plant.

The proposed Project would be required to comply with all applicable federal, state, and local provisions. The new two Small Lot single-family units are anticipated to generate 560 gallons per day of wastewater.⁴⁵ Upgrades to the existing wastewater infrastructure located on the Project Site would be required. The Project Applicant would be responsible for any wastewater infrastructure upgrades, and would connect to the Project Site infrastructure to the existing sewer lines located adjacent to the Site.

As discussed under threshold XIII(a), development of the proposed Project would result in a minimal population increase, which would be within the overall population anticipated in the Venice Community Plan Area and the City.

In addition, the proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact wastewater facilities because:⁴⁶

- The project not would produce a new or increased average daily wastewater flow of 4,000 gallons per day (gpd) or more.
- The proposed project would not produce wastewater flows greater than existing flows in an area shaded on Exhibits M.2-2 through M.2-11 in the City's Threshold Manual, because the proposed project is located outside a shaded area per Threshold Manual Exhibit M.2-10; and,
- The proposed project does not include a change in land use limitations (such as a zone change, variance or General Plan amendment), which could allow greater average daily flows than could be produced following the current land use limitations.

Thus, wastewater impacts would be less than significant and no further analysis is required in the EIR.

XVII(b). Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant – The City of Los Angeles Department of Water and Power (LADWP) will provide water service to the Project Site. Water is conveyed to users in the Project area along several circulating water mains of varying sizes. As discussed above in Section XVII(a), wastewater generated on the Project Site would be treated at the Hyperion Treatment Plant.

The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact water facilities, because: ⁴⁷

45 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page M.2-2, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>. Generation rates are found on page M.2-24, Exhibit M.2-12, Sewage Generation Factors. The generation rates for a four bedroom townhouse/SFD were used: 230/3Bd. Unit + 50/additional bedroom.

46 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page M.2-1, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

47 Ibid

- Implementation of the proposed Project would not cause the Venice Community Plan Area to exceed the projected growth in population, housing, or employment for the year of project occupancy/buildout.
- The proposed Project's water consumption would not require the construction of additional off-site water infrastructure.

The two new Small Lot single-family units potable water consumption would be similar to that of the surrounding residential uses, thus water supply lines in the vicinity of the Project Site would be sufficient to supply the anticipated water needs of the proposed Project. Further, the LADWP has an ongoing program of facility replacement and upgrades to meet the anticipated water demands based upon the City's adopted General Plan Framework Element.

The proposed Project would be required to modify the existing on-site water lines as necessary and would connect to the existing lines described above. LADWP would review the proposed Project plans to determine if any additional infrastructure is needed on- or off-site. The proposed Project would be required to comply with all applicable LADWP regulations. Impacts to the existing water distribution systems would be less than significant and no further analysis is required in the EIR.

XVII(c). **Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less Than Significant - A significant impact could occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving the Project Site, requiring the construction of new stormwater drainage facilities.

As described under threshold IX(e), the proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns. The proposed Project would involve only minor changes in the Project Site's drainage patterns and would not require any drainage courses or flood control channels to be altered. The proposed Project is subject to the regulatory requirements included in the SWPPP, LID, and Storm Drain Connection Permit requirements. Therefore, the proposed Project would have a less than significant impact on the storm water drainage system. Run-off from the Project Site is and would continue to be collected on-site and directed towards existing storm drains in the vicinity.

During the proposed Project's construction phase, the Project Applicant would be required to implement stormwater and erosion control BMPs to prevent pollution in stormwater discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.), as well as erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, stormwater inlet protection, and soil stabilization measures, etc.). Compliance with these measures and City grading regulations would ensure construction impacts related to stormwater discharge would be less than significant. No further analysis is required in the EIR.

During the proposed Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public

Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the proposed Project would meet the City's water quality standards. Therefore, Project impacts related to operational stormwater discharges would be less than significant. No further analysis is required in the EIR.

XVII(d). Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant – LADWP provides water supply to the Project Site.⁴⁸ LADWP publishes an Urban Water Management Plan (UWMP) every five years. The UWMP considers growth that is projected in regional planning documents, such as SCAG's Blueprint Report, estimates the projected future water demand associated with this growth, and identifies water sources and ways to meet the demand during various hydrological conditions over the next 25 years. In its 2015 UWMP LADWP has analyzed three different hydrological conditions to determine the reliability of the City's water supplies: average, single dry year, and multi-dry year. In each of the three hydrological conditions, the projected water demand was calculated taking into account growth in billing data, water conservation efforts, and demographics. The UWMP states that LADWP can reliably meet the projected water demand in each of the hydrological conditions over the next 25 years with its supply portfolio.⁴⁹

Development of the Project Site with two new Small Lot single-family units would increase water demand as compared to existing conditions. According to the LADWP, based on 2010-2013 historical water demands, the average water consumption per single-family unit is 337.2 gallons per day.⁵⁰ However, based on the proposed Project's characteristics and the water-energy-climate calculator (WeCalc) defaults, the average water consumption of each Small Lot single-family unit (under the Project), is expected to be 150 gallons per day.⁵¹ Thus to ensure a conservative approach, it is assumed that each new Small Lot single-family dwelling unit will consume 675 gallons of water per day, approximately 246,375 gallons of water per year.

As of January 1, 2011 projects in the City of Los Angeles are subject to the City of Los Angeles Green Building Code (LAGBC). The LAGBC is based on the 2010 California Green Building Standards Code, commonly known as "CALGreen" that was developed and mandated by the state to attain consistency among the various jurisdictions within the state; reduce buildings energy and water use; reduce waste; and reduce the carbon footprint. The proposed Project

48 Includes imported water.

49 LAWDP 2015 UWMP, Page ES-20, file:///C:/Users/348147/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP%20(1).pdf, accessed September 12, 2016.

50 LADWP 2015 Urban Water Management Plan, Page 2-9, file:///C:/Users/348147/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP%20(1).pdf, accessed September 12, 2016. See page 2-8 of the LADWP 2015 UWMP for the water demand forecast methodology.

51 Pacific Institute WeCalc website, <http://wecalc.org/calc/#>, accessed September 12, 2016. Water consumption is based on the number of toilets in each unit and the, and assuming a proposed pool.

would be subject to a LADBS – Green Building Plan Check.⁵² Water-related Green Building Plan check requirements include a check for: water conserving plumbing fixtures and fittings, appropriate showerheads, water submeters, water use reduction measures, irrigation controllers, swimming pool covers, etc. The Green Building plan check is designed to help ensure appropriate water conservation by residential uses.

State Assembly Bill 1881 (Laird, Water Conservation), aimed at conserving outdoor water use, requires cities and counties to update local Landscape Ordinances so that they are at least as effective as the State’s Department of Water Resource’s updated Model Water Efficient Landscape Ordinance (MWELO). To be in compliance, the City of Los Angeles implemented Irrigation Guidelines, which are essentially the same requirements as the State’s MWELO. The proposed Project is required to comply with the Irrigation Guidelines and to obtain a Landscaping Permit from the City of Los Angeles, which requires submittal of an irrigation plan with Water Management Point System Certification (LAMC 12.41.B1) or demonstration of compliance with the City’s Landscape Ordinance. It is not currently anticipated that the proposed Project would use non-potable water, due to the lack of an available non-potable water line in the vicinity.

Compliance with the regulatory requirements discussed above would help to ensure that the proposed Project’s water resource impacts are less than significant. As the proposed Project is consistent with the Project Site’s existing land use designation and zoning, in addition to SCAG’s 2012 RTP/SCS population projections, which the LADWP used in its 2015 UWMP to determine its water supply reliability, impacts related to water demand would be less than significant. No further analysis is required in the EIR.

XVII(e). Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

Less Than Significant – See threshold XVII(a), above. The Project Site is not located within an area of constrained sewer capacity. In addition, the existing wastewater treatment facilities are adequate to serve the proposed increase in demand. Therefore, the impacts to existing wastewater treatment facilities would be less than significant. No further analysis is required in the EIR.

XVII(f). Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

Less Than Significant – Under the proposed Project the existing 1,068 square foot vacant church located on the Project Site would be demolished. Construction activities associated with the proposed Project would generate inert waste. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard, and green wastes. Pursuant to CalGreen, the Project Applicant would be required to recycle/divert 65 percent of the construction waste. The remainder would be disposed of in a Class III landfill.

The Azusa Land Reclamation Landfill is owned, operated, and located in Los Angeles County. The landfill has an expected lifetime of 189 years. In addition, inert waste collected throughout

52 For details on the plan check requirements, see: <https://ladbs.org/forms-publications/forms/green-building>.

the County, including from the Project Site, could be disposed of in other inert landfills operated by local municipalities. Waste generated during the construction phase of the proposed Project would result in an incremental and intermittent increase in solid waste disposal at local landfills. As the Azusa Land Reclamation Landfill has a life expectancy of 189 years, solid waste impacts related to construction activities would be less than significant. No further analysis of is required in the EIR.

A majority of the City's solid waste is disposed of in the Sunshine Canyon Landfill;⁵³ however, depending on with whom the hauler has contracts, the waste could be sent to Chiquita Canyon, Simi Valley, or any of a number of other sites. **Table 8, Los Angeles County Disposal Facilities Used by the City of Los Angeles (2014)**, includes the County's disposal facilities where non-recyclable solid waste generated by the City was disposed of in 2014.

County of Los Angeles Facility	Total Annual Disposal of Solid Waste	City of Los Angeles Total Annual Disposal of Solid Waste	Percentage of Total Annual Disposal expended by the City
Antelope Valley Landfill	441,000 tons	251,370 tons	57 percent
Calabasas Landfill	221,000 tons	132,600 tons	60 percent
Chiquita Canyon Landfill	1,064,000 tons	585,200 tons	55 percent
Commerce Refuse to Energy Facility	96,000 tons	20,160 tons	21 percent
Lancaster Landfill	96,000 tons	960 tons	1 percent
Southeast Resource Recovery Facility	416,000 tons	45,760 tons	11 percent
Sunshine Canyon Landfill	2,366,000 tons	1,466,920 tons	62 percent
Total		2,502,970 tons	
Source: County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan, 2014 Annual Report.			
Notes: Total does not include inert waste or solid waste that was exported to facilities out of Los Angeles County.			

The proposed Project does not meet the City of Los Angeles' screening criteria for a project with the potential to impact solid waste facilities, because:⁵⁴

- The proposed Project would not result in solid waste generation of five tons or more per week.

The proposed Project would generate a net increase in solid waste generation of approximately 12.23 pounds per household per day, (approximately 86 pounds per week, or

53 City of Los Angeles, 2013 Zero Waste Progress Report, http://www.forester.net/pdfs/City_of_LA_Zero_Waste_Progress_Report.pdf, accessed July 6, 2016.

54 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006, Page M.3.2, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

2.2 tons per year), as compared to existing conditions.⁵⁵ These quantities represent no recycling activities in place. Should recycling occur in accordance with the current state law (AB 939), the proposed Project would generate a total of approximately 1.1 tons per year of solid waste (a 50 percent reduction). As the total amount of solid waste generated under the proposed Project would be less than the City's 5-ton threshold, solid waste impacts would be less than significant.

In addition, it should be noted that the County identifies landfill capacity in 15 year planning periods, the most recent of which ends in 2027.⁵⁶ Recent landfill expansion approvals and proposal for expansion at existing County landfills indicate that solid waste disposal facilities and other waste management options will be available beyond this date as new facilities and technologies are created to meet demand.

Thus, as shown in **Table 9, Existing Capacity of Los Angeles County Disposal Facilities Used by the City of Los Angeles**, sufficient capacity remains at the existing solid waste facilities (as shown in **Table 9**), necessary to accommodate the solid waste generated during operation of the proposed Project. Impacts would be less than significant and no further analysis is required in the EIR.

Table 9: Existing Capacity of Los Angeles County Disposal Facilities Used by the City of Los Angeles			
County of Los Angeles Facility	Remaining Capacity in million tons (2012)	Remaining Life (Years)	Percentage of Total Annual Disposal expended by the City
Antelope Valley Landfill	16.91	30	57 percent
Calabasas Landfill	5.51	16	60 percent
Chiquita Canyon Landfill	3.97	-	55 percent
Commerce Refuse to Energy Facility	466.64	-	21 percent
Lancaster Landfill	12.27	13	1 percent
Southeast Resource Recovery Facility	1,601.96	-	11 percent
Sunshine Canyon Landfill	74.37	20	62 percent

Source: County of Los Angeles 2014 Countywide Integrated Waste Management Plan.
 Notes: Year 2012 is the most recent data available. The Chiquita Canyon Landfill has reached the 1997 permitted disposal limit of 23 million tons. The County Director of Regional Planning granted a limited waiver that prevents the temporary closure of the landfill while the County decides whether or not to approve the requested expansion. If approved, the expansion would allow the landfill to continue to operate for at least an additional 21 years and possibly up to 38 years.

55 L.A. CEQA Thresholds Guide, City of Los Angeles, 2006, Page M.3.2.
<http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>

56 County of Los Angeles Department of Public Works, Los Angeles County Integrated Waste Management Plan 2012 Annual Report.

XVII(g). Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact – A significant impact may occur if the proposed Project would generate solid waste that was not disposed of in accordance with applicable regulations.

The proposed Project is located in a developed urban area and within a refuse collection area. In September 1989, the California Integrated Solid Waste Management (ISWM) Act (also known as AB 939) was passed. It required each city to divert at least 25 percent of its solid waste from landfill disposal through source reduction, recycling, and composting, by the end of 1995. Cities must now divert at least 50 percent of their waste stream and 75 percent by the year 2020. AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare annually a Source Reduction and Recycling Element (SRRE) to describe how it will reach its goals. The City of Los Angeles has prepared a Solid Waste Management Policy Plan (CiSWMPP), which was adopted by the City Council in November 1994. The CiSWMPP is a long-term planning document containing goals, objectives and policies for solid waste management for the City. It specifies citywide diversion goals and disposal capacity needs.⁵⁷ The proposed Project will comply with the policies of the CiSWMPP.

The proposed Project will be required to comply with all applicable regulations regarding solid waste disposal. No impact would occur and no further analysis is required in the EIR.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

XVIII(a). Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant – The proposed Project has the potential to impact a potential historical resource. As discussed in Section V Cultural Resources, above, the existing structure is eligible for listing in the National Register of Historic Places and/or California Register of Historical Resources. Impacts to biological resources are anticipated to be less than significant as detailed in this Initial Study. The potentially significant impacts to a historical resources will be analyzed further in the EIR.

XVIII(b). Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant – Based on the proceeding discussions, no significant impacts were identified for 16 of the 17 environmental factors analyzed above. While not expected to be cumulatively considerable, the potential cumulative impacts to a potential historical resource will be analyzed in the EIR.

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L.A. CEQA Thresholds Guide, City of Los Angeles, 2006. Page M3.1-M.3.2, <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.

XVIII(c). Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant – As detailed in this Initial Study, construction and operation of the proposed Project would not result in potentially significant impacts to human beings. Impacts would be less than significant and no further analysis is required in the EIR.