



# City of Los Angeles

Department of City Planning • Environmental Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act

### West Adams-Baldwin Hills-Leimert Community Plan Area

## Cumulus Transit Oriented/Mixed-Use Project

Case Number: ENV-2014-4755-EIR

**Location:** 3321, 3351 S. La Cienega Blvd.; 5707, 5717, 5727, 5733, 5735 W. Jefferson Blvd., Los Angeles, CA 90016

**Council District:** 10, Herb Wesson

**Project Description:** The proposed Project consists of the demolition of an existing office building, accessory structures and four light industrial structures (approximately 63,313 square feet), two existing radio tower structures and the development of an approximately 1,900,000-square foot transit oriented, mixed-use development consisting of podium style buildings, that vary in number of stories and height up to approximately 300 feet. The Applicant may seek flexible land use entitlements (based on equivalent environmental impacts) with a base plan of approximately 1,218 multi-family residential units (up to 1,600,000 square feet of residential floor area) and up to 300,000 square feet of commercial floor area on the lower ground floors. The commercial space would include 200,000 square feet of office space, 50,000 square feet of grocery store, 20,000 square feet of restaurant space, and 30,000 square feet of general retail. Parking would be provided within a combination of above ground and subterranean parking levels and will follow the LAMC requirements. The Project Site is on approximately 11.19 acres ( $\pm$  487,535 square feet).

In order to implement the Project, the Project Applicant is requesting approval of the following discretionary actions from the City: General Plan Amendment from Limited Manufacturing to Community Commercial; a Zone Change from MR1 to C2; a Height District Change from 1VL to Height District 2; Site Plan Review Findings; a Conditional Use Permit to allow for a Unified Development; a Conditional Use Permit for a Major Project; and a tract map for subdivision of the commercial parcels and the possible subdivision of air space for condominium purposes.

APPLICANT:

CP V Cumulus, LLC  
1000 Sansome Street, Suite 180  
San Francisco, CA 94111

PREPARED BY:

CAJA Environmental Services  
11990 San Vicente Boulevard  
Los Angeles, CA 90049

ON BEHALF OF:

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section  
200 North Spring Street, Room 750  
Los Angeles, CA 90012-2601

March 2015

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## 1. PROJECT DESCRIPTION

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The subject of this Initial Study (IS) is the proposed Cumulus Transit Oriented/Mixed-Use Project. The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the Lead Agency to determine whether an Environmental Impact Report (EIR) or a Mitigated Negative Declaration must be prepared or to identify the significant environmental effects to be analyzed in an EIR.

### **Project Information**

Project Title: Cumulus Transit Oriented/Mixed-Use Project

Project Location: 3321, 3351 S. La Cienega Blvd.; 5707, 5717, 5727, 5733, 5735 W. Jefferson Blvd., Los Angeles, CA 90016

Project Applicant: CP V Cumulus, LLC  
1000 Sansome Street, Suite 180, San Francisco, CA 94111

Lead Agency: City of Los Angeles  
Department of City Planning  
200 North Spring Street, Room 750, Los Angeles, California 90012  
Attn: Sergio Ibarra

### **Regulatory Framework**

According to CEQA Guidelines, Article 5. Preliminary Review of Projects and Conduct of Initial Study:

#### *15063. INITIAL STUDY*

*(a) Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.*

*(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.*

*(2) To meet the requirements of this section, the lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.*

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

- (B) Identifying the effects determined not to be significant,
- (C) Explaining the reasons for determining that potentially significant effects would not be significant, and
- (D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

- (4) Facilitate environmental assessment early in the design of a project;
- (5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;
- (6) Eliminate unnecessary EIRs;
- (7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

- (1) A description of the project including the location of the project;
- (2) An identification of the environmental setting;
- (3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.
- (4) A discussion of the ways to mitigate the significant effects identified, if any;
- (5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;
- (6) The name of the person or persons who prepared or participated in the Initial Study.

## **Location**

The Project Site is located within the West Adams – Baldwin Hills – Leimert Community Plan Area (West Adams CP) of the City of Los Angeles (City). The Project Site is located at the northwest corner of La Cienega and Jefferson Boulevards, at 3321, 3351 S. La Cienega Boulevard and 5707, 5717, 5727, 5733, 5735 W. Jefferson Boulevard Los Angeles, CA 90016. Culver City is located to the north and west

of the Project Site, at a variable distance of approximately 300 to 500 feet. Ballona Creek is also located approximately 500 feet to the west. The Project Site is generally rectangular-shaped with light industrial and warehouse uses to the north and west. See Figure 1, Regional and Local Vicinity Map, for the location within the City. See Figure 2, Aerial Map, for the Project Site and surrounding areas. The West Adams CP, located about 7 miles southwest of Downtown Los Angeles, contains 8,243 acres or approximately 13 square miles of land area. It is bounded on the north by Pico and Venice Boulevards, on the west by Robertson Boulevard and the Cities of Culver City and Inglewood, and the County of Los Angeles. The City of Inglewood forms the southern boundary at 79th Street, and Arlington/Van Ness Avenues border the West Adams Community Plan on the east.

### ***Regional and Local Access***

Regional access is provided by the Santa Monica Freeway (I-10) located approximately 0.5 mile north of the Project Site at Washington Boulevard. Local access is provided by Fairfax Avenue, La Cienega Boulevard, Jefferson Boulevard, and National Boulevard.

### ***Public Transit***

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus and rail service to the Project Site. Service along La Cienega Boulevard is provided by Metro Bus Lines 35, 105, 217, and Rapid 705, while service along Jefferson Boulevard is provided by Metro Bus Lines 35 and 217. The Metro Expo Line Light Rail's La Cienega/Jefferson Station is located directly south of the Project Site. Culver City Bus Line 4 (Jefferson Boulevard) provides service on La Cienega and Jefferson.

### ***Site Characteristics***

The Project Site's assessor parcel numbers (APNs), zoning, land use designation, and lot size are listed in Table 1, Project Site. The total area (pre-dedication) is approximately 487,535 square feet (or 11.19 acres). The Project Site is zoned MR1-1VL (Restricted Industrial Zone, Height District 1 Very Limited), has a General Plan land use designation of Limited Manufacturing, and is within the areas affected by Zoning Information ZI-2374 Los Angeles State Enterprise Zone, ZI-2412 Fast Food Establishment, and ZI-1117 MTA Project (APN 4205-033-015 only).<sup>1</sup>

### ***Existing Uses***

The Project Site is improved with an existing office building, accessory structures, and four light industrial structures (totaling approximately 63,313 square feet of floor area), and two existing radio

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<sup>1</sup> City of Los Angeles, Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org/>.

tower structures. The existing floor-area-ratio is 0.13:1. The Project would remove all existing improvements.

**Table 1**  
**Project Site**

Address	APN	Zone	General Plan Land Use	Size (sf) <sup>1</sup>
None (Por. of Lot 28)	4205-033-007	MR1-1VL	Limited Manufacturing	+/- 453,079
3321, 3351 S. La Cienega (Por. of Lot 29)				+/- 34,456
5707, 5717, 5727, 5733, 5735 W. Jefferson Boulevard (Por. of Lot 29)				+/- 487,535
<b>Total</b>				+/- 487,535

<sup>1</sup>TCA Architects, Plot Plan, Environmental Assessment, December 18, 2014.  
Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org/>. Table by CAJA Environmental Services, December 2014.

## Surrounding Uses

- To the west are industrial buildings zoned MR1. The City of Culver City boundary and the Ballona Creek are located one block away.
- To the south across Jefferson Boulevard is the Metro Expo Line Light Rail's La Cienega/Jefferson Station. Further south are industrial buildings in the [Q] M1-2D zone. Approximately two blocks south at Clemson Street are commercial buildings in the C4 zone.
- To the north is a private alley and industrial buildings zoned MR1.
- To the east across La Cienega Boulevard are commercial uses in the C2 and R4 zones. Further to the east are residential uses in the R1 and R3 zones.

## Proposed Project

The Project involves the development of an approximately 1,900,000-square foot transit-oriented, mixed-use development consisting of podium style buildings, that vary in number of stories and height up to approximately 300 feet. The Applicant may seek flexible land use entitlements (based on equivalent environmental impacts) with a base plan of approximately 1,218 multi-family residential units (up to 1,600,000 square feet of residential floor area) and up to 300,000 square feet of commercial floor area on the lower ground floors. The residential units would include 609 1-bedroom units (50% of total), 487 2-bedroom units (40% of total), and 122 3-bedroom units (10% of total). The commercial space would include 200,000 square feet of office space, 50,000 square feet of grocery store, 20,000 square feet of restaurant space, and 30,000 square feet of general retail. Parking would be provided within a

combination of above ground and subterranean parking levels and will follow the LAMC requirements. Figure 3 provides Plot Plan.

### **FAR and Density**

The Project's Floor Area Ratio (FAR) would be 3.9:1 (1,900,000 square feet) with 1,600,000 square feet of residential floor area (FAR is 3.28:1) and 300,000 square feet of commercial floor area (FAR is 0.62:1). The Project's Residential Density is 1 dwelling unit (DU) per 400 square foot of area.

### **Access**

Vehicle access for the Project would be via several driveway: from La Cienega Boulevard at Boden Street; from midpoint along the Project Site southern boundary along Jefferson Boulevard; and from the southwest corner of the Project Site along Jefferson Boulevard. Pedestrian access would be provided at several points along La Cienega Boulevard and also along Jefferson Boulevard. There would also be a pedestrian paseo on La Cienega just south of Boden Street.

### **Parking**

Table 2 lists the required vehicle parking. The Project would provide parking per the requirements of Los Angeles Municipal Code (LAMC) Section 12.21. Parking would be provided on the Site within a combination of above ground and subterranean parking levels. LAMC 12.21.A.4 allows replacement of 1 auto parking space per 4 bicycle parking stalls provided. For residential, 320 auto spaces can be replaced.<sup>2</sup> For commercial, 40 auto spaces can be replaced.<sup>3</sup> Thus, 2,371 vehicle parking spaces would be required.

**Table 2**  
**Vehicle Parking**

Use	Amount	Rate	Total Required
<b>Residential</b>			
1-Bedroom	609 units	1.5 space / unit	913
2-Bedroom	487 units	2.0 spaces / unit	974
3-Bedroom	122 units	2.0 spaces / unit	244
<b>Subtotal (Residential)</b>			<b>2,131</b>
<b>Reduction per Bike Parking Ordinance</b>			<b>(320)</b>

<sup>2</sup> 1,340 residential bike spaces / 4 = 335. However, per the maximum replacement of 15% of the total auto spaces (.15 x 2,131 = 320), this is limited to 320 spaces.

<sup>3</sup> 160 commercial bike spaces / 4 = 40.

<b>Total (Residential)</b>			<b>1,811</b>
<b>Commercial</b>			
Retail	100,000 sf	2 spaces / 1,000 sf	200
Office	200,000 sf	2 spaces / 1,000 sf	400
<b>Subtotal (Commercial)</b>			<b>600</b>
<b>Reduction per Bike Parking Ordinance</b>			<b>(40)</b>
<b>Total (Residential)</b>			<b>560</b>
<b>Total (Project)</b>			<b>2,371</b>
<p><i>Applicant provided, January 29, 2015.</i></p> <p><i>1.5 spaces per each unit with 3 habitable rooms per LAMC 12.21.A.4.(a).</i></p> <p><i>2 spaces per each unit with &gt;3 habitable rooms per LAMC 12.21.A.4(a).</i></p> <p><i>2 spaces per 1,000 sf per LAMC 12.21.A.4(x).(3)6.</i></p>			
<i>Table by CAJA Environmental Services, January 2015.</i>			

### Bicycles

LAMC Section 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses (retail stores) require one short-term and one long-term bicycle space per 2,000 square feet of floor area. Office uses require one short-term per 10,000 square feet and one long-term bicycle space per 5,000 square feet of floor area. Multi-family residential requires one long-term bicycle parking space per unit and one short-term bicycle parking space per 10 units. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. Table 3 lists the required bicycle parking. The Project would provide 1,500 bicycle spaces (192 short-term spaces and 1,308 long-term spaces).

**Table 3**  
**Bicycle Parking**

Use	Amount	Rate	Required Short-term	Required Long-term	Total
Residential	1,218 units	1 per 10 units (short-term) 1 per unit (long-term)	122	1,218	<b>1,340</b>
Retail	100,000 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	50	50	<b>100</b>
Office	200,000 sf	1 per 5,000 sf (short-term) 1 per 10,000 sf (long-term)	20	40	<b>60</b>

<b>Total (Project)</b>	<b>192</b>	<b>1,308</b>	<b>1,500</b>
<i>Applicant provided, January 29, 2015. Table by CAJA Environmental Services, January 2015.</i>			

### Amenities and Open Space

Table 4 provides the amount of required open space. The Project would provide at least the code-required open space of approximately 143,125 square feet, in the form of various common open space areas and private open space (balconies).

**Table 4**  
**Open Space**

Use	Amount	Rate	Total size (sf)
<b>Required</b>			
<3 Habitable rooms	609 units	100 sf / unit	60,900
=3 Habitable rooms	487 units	125 sf / unit	60,875
>3 Habitable rooms	122 units	175 sf / unit	21,350
		<b>Total</b>	<b>143,125</b>

*Applicant provided, January 29, 2015. Habitable room includes each room other than a “lobby, hall, closet, storage space, water closet, bath, toilet, slop sink, general utility room or service porch” or kitchen that is less than 100 sf.*

*A 1-bedroom unit would typically have 1 bedroom and a living room = 2 habitable rooms.*

*A 2-bedroom unit would typically have 2 bedrooms and a living room = 3 habitable rooms.*

*A 3-bedroom unit would typically have 3 bedrooms and a living room = > 3 habitable rooms.  
Table by CAJA Environmental Services, January 2015.*

### **Discretionary Actions**

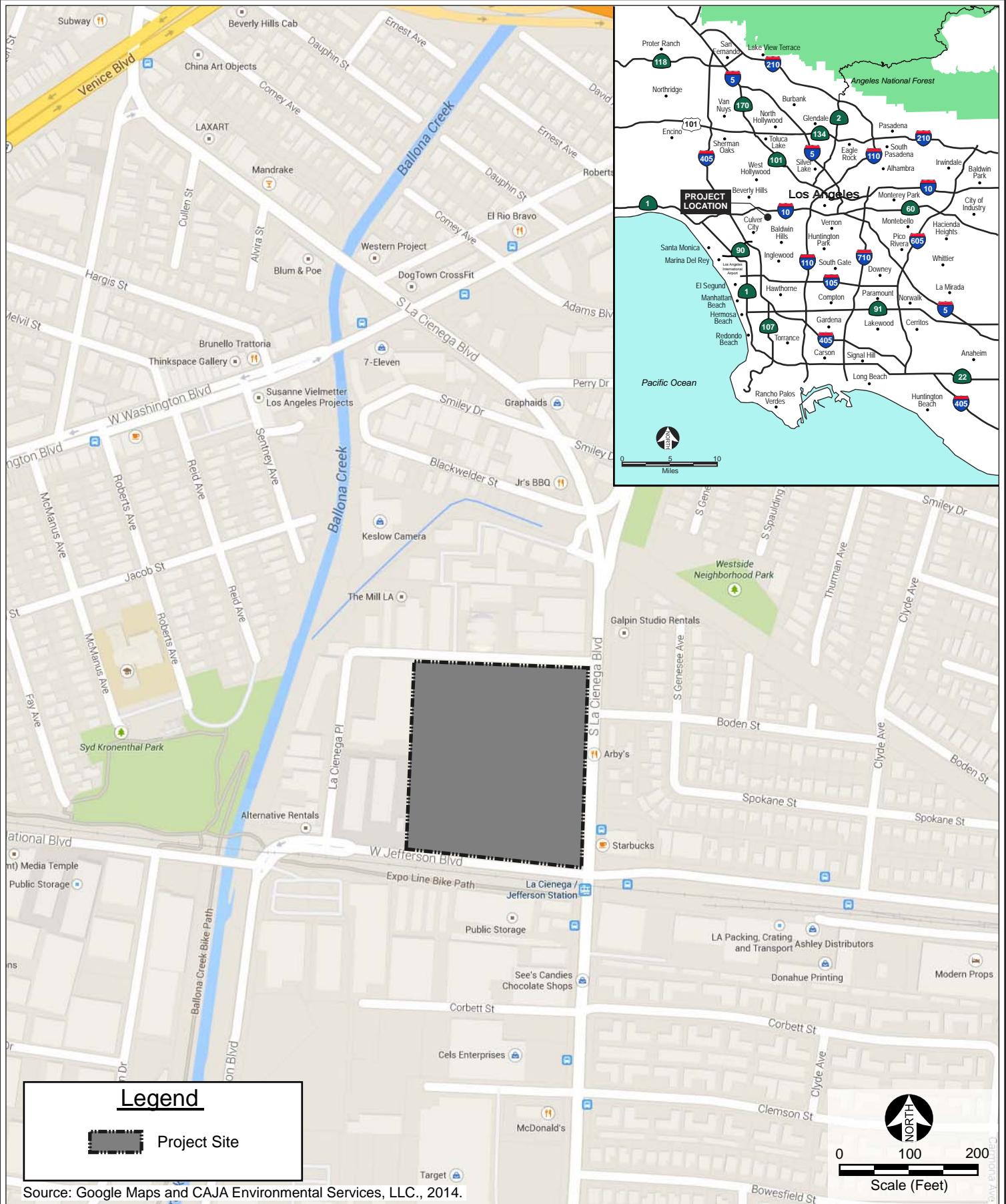
The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the applicant is requesting approval of the following discretionary actions from the City:<sup>4</sup>

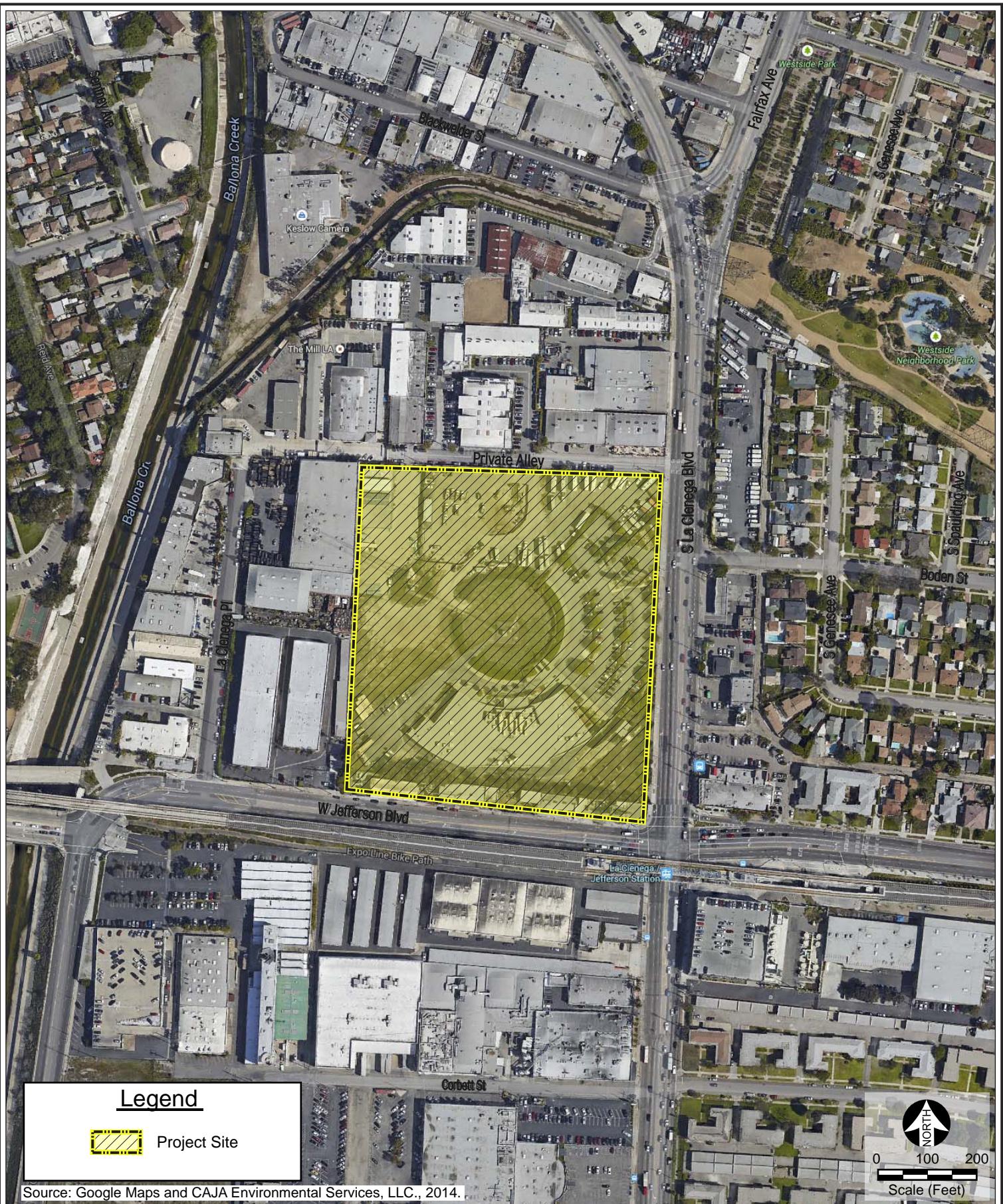
1. General Plan Amendment from Limited Manufacturing to Community Commercial;
2. Zone Change and Height District Change from MR1-1VL to C2-2;
3. Site Plan Review finding;
4. Conditional Use Permit to allow for a Unified Development;
5. Conditional Use Permit for a Major Project; and
6. Tract Map for subdivision of a commercial parcels and the possible subdivision of air space for condominium purposes.

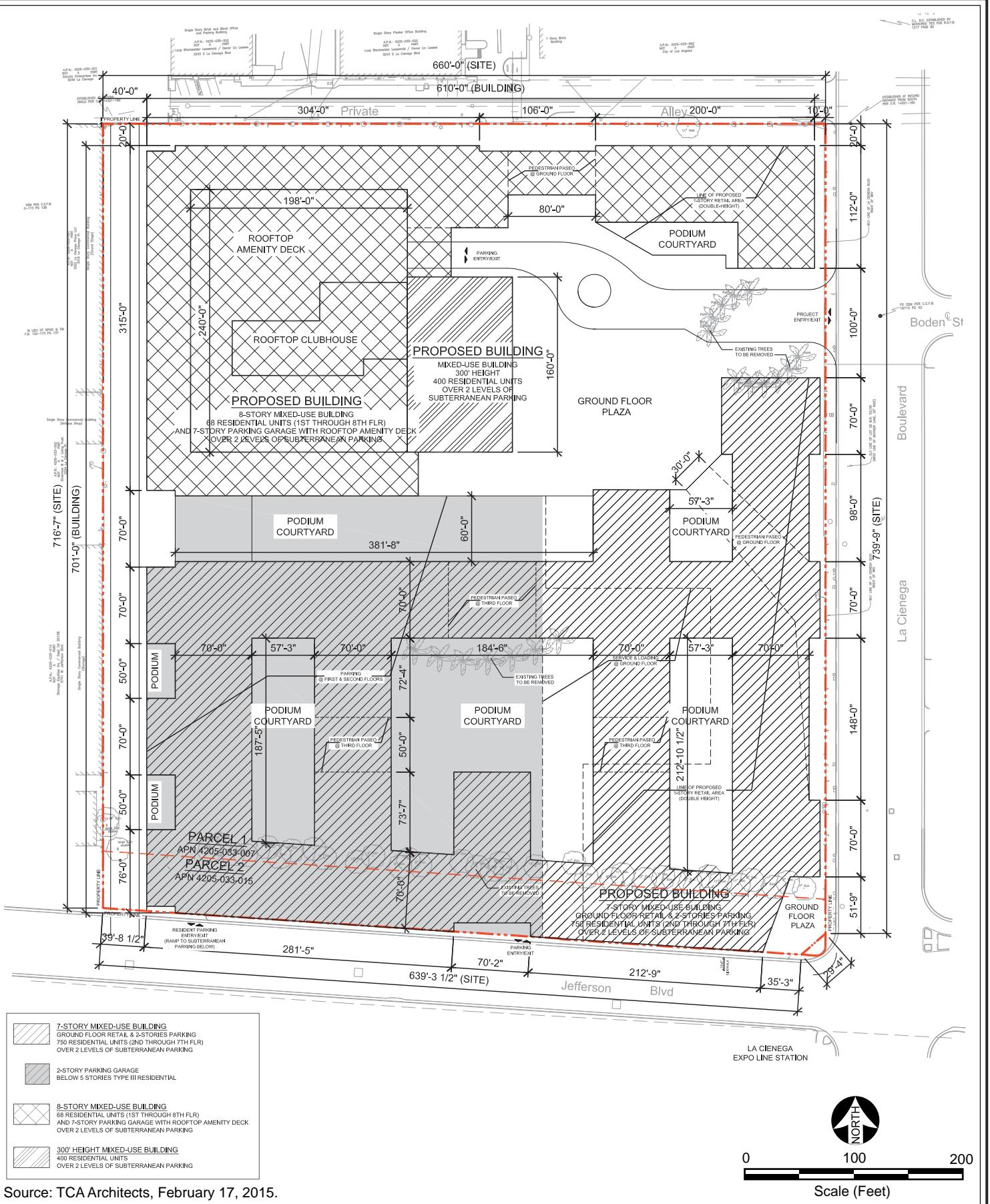
Any additional actions, as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

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<sup>4</sup> *Environmental Assessment Form, December 18, 2014.*







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Source: TCA Architects, February 17, 2015.

CAJA Environmental Services, LLC

**Figure 3**  
**Plot Plan**

## **2. INITIAL STUDY CHECKLIST**

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LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
Los Angeles City Planning Department	10, Herb Wesson	March 2015

### **RESPONSIBLE AGENCIES**

Southern California Air Quality Management District; Los Angeles Regional Water Quality Control Board

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PROJECT TITLE/NO.	CASE NO. 2014-4755-EIR
Cumulus Transit Oriented/Mixed-Use Project	

PREVIOUS ACTIONS CASE NO. N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.
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### **PROJECT DESCRIPTION:**

See Section I (Project Description).

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### **ENVIRONMENTAL SETTING:**

See Section I (Project Description).

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### **PROJECT LOCATION**

3321, 3351 S. La Cienega Blvd.; 5707, 5717, 5727, 5733, 5735 W. Jefferson Blvd., Los Angeles, CA 90016

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PLANNING DISTRICT	STATUS:
West Adams-Baldwin Hills-Leimert Community Plan Area	<input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED 05/06/1998

EXISTING ZONING MR1-1VL	MAX. DENSITY ZONING N/A	<input type="checkbox"/> DOES CONFORM TO PLAN
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PLANNED LAND USE & ZONE Community Commercial C2-2	MAX. DENSITY PLAN 1 unit / 400 square feet 1VL (M zone) allows 45 feet (3 stories) and 1.5:1 FAR	<input checked="" type="checkbox"/> DOES NOT CONFORM TO PLAN
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SURROUNDING LAND USES Industrial, Residential, and Retail	PROJECT DENSITY 1 unit / 400 square feet	<input type="checkbox"/> NO DISTRICT PLAN
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	1,218 residential units and 3.9:1 FAR (total project)
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### **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 Associate

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 a project 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 “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - 1) Earlier Analysis Used. Identify and state where they are available for review.
  - 2) 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.
  - 3) 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:
  - 1) The significance criteria or threshold, if any, used to evaluate each question; and
  - 2) The mitigation measure identified, if any, to reduce the impact to less than significance.

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

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


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**BACKGROUND**

PROPOSER NAME	PHONE NUMBER
CP V Cumulus, LLC	415-273-2900

**PROPOSER ADDRESS**

1000 Sansome Street, Suite 180  
San Francisco, CA 94111

Contact: Neils Cotter

AGENCY REQUIRING CHECKLIST	DATE SUBMITTED
City of Los Angeles Planning Department	February 2015

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated			Less Than Significant Impact	No Impact

**I. Aesthetics.** Would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?
- c. Substantially degrade the existing visual character or quality of the site and its surroundings?

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

**II. Agricultural And Forestry 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 Range and Assessment Project and Forest Legacy Assessment project and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?
- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?)
- d. Result in the loss of forest land or conversion of forest land to non-forest use?
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

**III. Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

- a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?
- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM 2.5, & PM 10) under an applicable federal or state ambient air quality standard?
- d. Expose sensitive receptors to substantial pollutant concentrations?
- e. Create objectionable odors affecting a substantial number of people?

**IV. Biological Resources.** Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

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

**V. Cultural Resources:** Would the project:

- a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?
- b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?
- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- d. Disturb any human remains, including those interred outside of formal cemeteries?

**VI. Geology and Soils.** Would the project:

- a. Exposure of 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.
- ii. Strong seismic ground shaking?
- iii. Seismic-related ground failure, including liquefaction?
- iv. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?

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

**VII. Greenhouse Gas Emissions.** Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**VIII. Hazards and Hazardous Materials.** Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would

it create a significant hazard to the public or the environment?

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?
- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

**IX. Hydrology And Water Quality.** Would the project:

- a. Violate any water quality standards or waste discharge requirements?
- b. Substantially deplete groundwater supplies or interfere 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 land uses for which permits have been granted)?
- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a

stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

- e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- f. Otherwise substantially degrade water quality?
- g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h. Place within a 100-year flood plain structures which would impede or redirect flood flows?
- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j. Inundation by seiche, tsunami, or mudflow?

**X. Land Use And Planning.** Would the project:

- a. Physically divide an established community?
- b. Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

**XI. Mineral Resources.** 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?

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

**XII. Noise.** Would the project:

- a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?
- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

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

elsewhere?

- c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

**XIV. Public Services.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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?
- b. Police protection?
- c. Schools?
- d. Parks?
- e. Other governmental services (including roads)?

**XV. Recreation.**

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

**XVI. Transportation/Circulation.**

Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance

of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

- b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?
- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**XVII. Utilities.** Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d. Have sufficient water supplies available to serve the

project from existing entitlements and resource, or are new or expanded entitlements needed?

- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g. Comply with federal, state, and local statutes and regulations related to solid waste?

#### **XVIII. Mandatory Findings Of Significance.**

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

**ENVIRONMENTAL IMPACTS**

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated		
		Less Than Significant Impact	No Impact	
<b>I. Aesthetics.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a:**

A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.

The Project Site is in an urbanized portion of Los Angeles, and topographically relatively flat. The Project would construct approximately five buildings (up to approximately 300 feet in height). The Project would increase the building heights on the Site from existing uses which are one and two-story buildings. The Baldwin Hills are located approximately 1 mile south. Therefore, this potential impact will be analyzed in the EIR.

**Response b:**

A significant impact would occur only where scenic resources would be damaged or removed by the project. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway. According to the City's SurveyLA Resource, there are no eligible

individual resources, historic districts, Historic-Cultural Monuments (HCMs), or California and National Register properties nearby the Site.<sup>5</sup> The Site is an industrial zoned parcel and surrounded by post-1980 construction buildings. No historic resources would be impacted by the Project. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response c:**

A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the area. The Project would increase the building heights on the Site from existing uses and would introduce new architectural elements to the area. Therefore, this issue will be analyzed in the EIR.

**Response d:**

A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

*Artificial Light*

An adverse impact would occur if the project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. Nevertheless, aesthetic impacts to the nearby residential properties may result due to excessive illumination at the Project Site. Therefore, this issue will be analyzed further in an EIR.

*Glare*

An adverse impact would occur if the project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project, exterior building windows, and surfaces of brightly painted buildings

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<sup>5</sup> Los Angeles SurveyLA: [http://www.preservation.lacity.org/files/WABHL\\_Survey\\_Results\\_Map.pdf](http://www.preservation.lacity.org/files/WABHL_Survey_Results_Map.pdf)

in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The potential exists for glass or other shiny building materials to cause glare impacts at nearby residential uses. Therefore, this issue will be analyzed further in an EIR.

#### *Shade/Shadow*

The analysis of the proposed project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. The Project would include a mixed-use building up to 300 feet in height. The City of Los Angeles requires a shade/shadow evaluation for any building over 60 feet in height.<sup>6</sup> Shadows typically will project from the northwest to the northeast and a shadow's largest projection is approximately 3 times the height of the building. There is a public park (Syd Kronenthal Park) and residential uses located to the west and northwest. This issue will be analyzed further in an EIR.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**II. Agricultural And Forestry 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 Range and Assessment Project and Forest Legacy Assessment project and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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



<sup>6</sup> City of Los Angeles, CEQA Thresholds Guide, 2006, Section A (Aesthetics and Visual Resources), Part 4.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
agricultural use?				
b. Conflict the 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 by Public Resources Code section 122220(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"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Responses a-e:

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed (office building, light industrial structures, radio towers, and surface parking). The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>7</sup> The Site is zoned Industrial (MR1). No Williamson Act Contract applies to the Site. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

<sup>7</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf>, January 13, 2012.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. Air Quality.</b> The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM 2.5, & PM 10) under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

**Response a:**

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM<sub>10</sub>, and PM<sub>2.5</sub>). As such, the project would be subject to the SCAQMD's AQMP. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>8</sup> With regard to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility

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<sup>8</sup> SCAG is the federally designated metropolitan planning organization (MPO) for Southern California region.

chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with the City's General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. As a result, project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A project would result in a significant air quality impact if project-related emissions exceed federal, State or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction and operation of the Project has the potential to generate emissions which could exceed federal, State, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact would occur if the proposed project would result in a cumulatively considerable net increase in a federal or State non-attainment pollutant. Because the Basin is currently in non-attainment for ozone (1-hour and 8-hour standards), PM<sub>10</sub>, and PM<sub>2.5</sub>, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. With regard to determining the significance of the Project's contribution to regional emissions, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal or State non-attainment pollutant. Therefore, this issue will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.<sup>9</sup> Sensitive receptors in the Project vicinity include residential areas to the northwest, east, and southeast; public parks to the west and northeast; and a school to the west. The Project could

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<sup>9</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.

expose these sensitive receptors to substantial pollutant concentrations. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact would only occur if the project would generate substantial odors. The SCAQMD's *CEQA Air Quality Handbook*, identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include any of the uses identified by the SCAQMD as being associated with odors. While the project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase to a less than significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the project's short-term construction phase to a less than significant level. The Project would not create objectionable odors affecting a substantial number of people during construction or long-term operation because it does not include uses associated with common odor complaints. Therefore, a less than significant impact would occur. Further evaluation of this issue in an EIR is not required.

				Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact			

**IV. Biological Resources.** Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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 corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a:**

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the State or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with buildings, paving, and minimal landscaping. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, a less than significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

**Response b:**

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a

project. There are no riparian areas located on or adjacent to the Project Site.<sup>10</sup> While the Ballona Creek is located to the west, it is not identified by the US National Wetlands Inventory as Riparian.<sup>11</sup> Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response c:**

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site. The Ballona Creek to the west is identified as Wetland - Riverine.<sup>12</sup> This wetland is a channelized area completely surrounded by urban uses, including light industrial uses. The intervening buildings and distance to the Site ensure that the Project would have a less than significant impact on the nearby wetland. Further evaluation of this issue in an EIR is not required.

**Response d:**

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with buildings, paving, and minimal landscaping and would not interfere substantially with the movement of any native resident or migratory birds. The Site is located within an urban area that is highly disturbed. The nearest location that contains vegetation with the potential for supporting migratory bird and/or wildlife use is the Baldwin Hills and Kenneth Hahn State Recreation Areas located 1 mile to the south. The Project would not involve changes in the existing environment that could interfere with the movement of migratory birds or other wildlife species. In addition, no bodies of water exist on the Site to provide habitat for fish. As such, project implementation would neither interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors nor impede the use of native wildlife nursery sites. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response e:**

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to previously developed Site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern

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<sup>10</sup> NavigateLA, Water, Lakes, and Streams layer: <http://navigatela.lacity.org/index01.cfm>

<sup>11</sup> U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>

<sup>12</sup> U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>

California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).<sup>13</sup> Any removed tree would need to comply with the ordinance. The Project would remove trees on the Site and provide replacement per the ordinance. There is the potential for Oak trees to be on the Site. Therefore, this potential impact will be analyzed in the EIR.

#### **Response f:**

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with buildings, paving, and minimal landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area. The nearest is located at the Baldwin Hills and Kenneth Hahn State Recreation Areas 1 mile south.<sup>14</sup> Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated			Less Than Significant Impact	No Impact
		Mitigation Incorporated	Less Than Significant Impact	No Impact		

#### **V. Cultural Resources:** Would the project:

- a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?
- b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?
- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- d. Disturb any human remains, including those interred outside of formal cemeteries?

#### **Response a:**

Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California

<sup>13</sup> City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.

<sup>14</sup> NavigateLA, Significant Ecological Area layer: <http://navigatela.lacity.org/index01.cfm>.

Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The Site contains buildings that are older than 45 years. However, none of the existing buildings are listed or expected to be listed in an historical register.<sup>15</sup> Therefore, a less than significant impact would occur. Further evaluation of this issue in an EIR is not required

**Response b:**

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources which fall under either of these categories. The excavation of the subterranean parking levels has the potential to affect unknown archaeological resources. Project impacts with respect to archaeological resources are potentially significant and will be analyzed further in an EIR.

**Response c:**

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb paleontological resources or geologic features which presently exist within the Project Site. The excavation of the subterranean parking levels has the potential to affect unknown paleontological resources. Project impacts with respect to paleontological resources are potentially significant and will be analyzed further in an EIR.

**Response d:**

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and developed with office, light industrial uses, radio towers, and surface parking. The likelihood of encountering human remains on the Project Site is minimal. However, during the construction phase and excavation of the subterranean parking levels, there is a possibility that human remains could be encountered. Project impacts with respect to human remains are potentially significant and will be analyzed further in an EIR.

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<sup>15</sup> Los Angeles SurveyLA: [http://www.preservation.lacity.org/files/WABHL\\_Survey\\_Results\\_Map.pdf](http://www.preservation.lacity.org/files/WABHL_Survey_Results_Map.pdf)

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**VI. Geology and Soils.** Would the project:

- a. Exposure of 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.
  - ii. Strong seismic ground shaking?
  - iii. Seismic-related ground failure, including liquefaction?
  - iv. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- 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?
- 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?

**Response a.i:**

Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Site is within a Fault Rupture Study Area, but not within an Alquist-Priolo Fault Zone.<sup>16, 17</sup> This requires additional seismic evaluation to determine whether a fault crosses the Site. The Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Potential impacts associated with fault rupture will be analyzed further in an EIR.

**Response a.ii:**

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, as with all properties in the seismically active Southern California region, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking on one of the local regional faults. The Project would conform to all applicable provisions of the City Building Code and the UBC with respect to new construction. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Nonetheless, as the Site is located in a seismically active region, this issue will be analyzed further in an EIR.

**Response a.iii:**

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is identified by ZIMAS as being within a liquefaction zone.<sup>18</sup> The City of Los Angeles Seismic Safety Element identifies the Project Site

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<sup>16</sup> City of Los Angeles, ZIMAS Parcel Profile Reports, website: <http://zimas.lacity.org..>

<sup>17</sup> City of Los Angeles, Safety Element of the General Plan, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, Exhibit A.

<sup>18</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org..>

as being within a liquefiable area.<sup>19</sup> The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis and remedial measures prior to development. Furthermore, the Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Potential impacts associated with liquefaction will be analyzed further in an EIR.

**Response a.iv:**

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is not classified as a landslide hazard zone in the CGS Seismic Hazards Map.<sup>20</sup> The Project Site is also not identified by ZIMAS as being within a landslide hazard zone.<sup>21</sup> Therefore, a less than significant impact would occur. Further evaluation of this issue in an EIR is not required

**Response b:**

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and was previously developed with office, light industrial uses, radio towers, and surface parking. Any topsoil that may exist on the Site was previously blended with other on-site soils during previous site preparation/grading activities. As such, development of the Project would not result in substantial loss of topsoil. Construction activities such as grading and excavation could create a potential for soil erosion. The potential for soil erosion on the Project Site is low due to the generally level topography of the Project Site and the presence of off-site drainage facilities. Project construction would require the removal of existing pavement and grading earth and excavation. Conformance with City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the Los Angeles Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15). Therefore, project impacts related to soil erosion during construction, with the inclusion of the proposed design features, are anticipated to be minimal. The potential for soil erosion during project operation would be relatively low due to the urban nature of the Project area and the generally level

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<sup>19</sup> City of Los Angeles, *Safety Element of the General Plan, Areas Susceptible to Liquefaction in the City of Los Angeles, Exhibit B*.

<sup>20</sup> California Geologic Survey, Seismic Hazard Zones, Hollywood Quadrangle: [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_holly.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf).

<sup>21</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

topography of the Site. Therefore, a less than significant impact would occur. Further evaluation of this issue in an EIR is not required.

**Response c:**

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Project Site is located in an urbanized portion of Los Angeles and was previously developed with office, light industrial uses, radio towers, and surface parking. The Project Site is identified by ZIMAS as being within a liquefaction zone.<sup>22</sup> The City of Los Angeles Seismic Safety Element identifies the Project Site as being within a liquefiable area.<sup>23</sup> Earthquake-induced volumetric strain and dissipation of pore pressure in saturated silts and sands after liquefaction can result in settlement. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. However, Project construction may require dewatering to accommodate the subterranean parking. Therefore, this issue will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. Although the Project must comply with building regulations set forth by the California Building Code, the potential for an impact still exists. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

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<sup>22</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

<sup>23</sup> City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction in the City of Los Angeles, Exhibit B.

Potentially Significant Impact	Mitigation Incorporated	Potentially Significant Unless Less Than Significant Impact	No Impact
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**VII. Greenhouse Gas Emissions.** Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Responses a and b:**

Construction and operation of the Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project's generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.

Potentially Significant Impact	Mitigation Incorporated	Potentially Significant Unless Less Than Significant Impact	No Impact
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**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
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project 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"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a:**

A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. During operation, residential and retail/restaurant uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. As the buildings occupying the Project Site were constructed prior to 1970, they likely contain asbestos-containing-materials (ACMs) as well as lead-based-paint (LBP). Overhead electrical transmission and distribution lines and pole-mounted transformers that may contain polychlorinated biphenyls (PCBs) are also located on the Project. In addition, the radio towers equipment may contain hazardous materials. Hazardous petroleum products may also be located on-site. Therefore, construction activities may have the potential to expose construction workers and sensitive receptors in the project area to hazards

associated with accidental exposure to ACMs, LBP, PCBs, and/or petroleum products. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project Site is located within 0.25 mile of the following school:<sup>24</sup>

- Echo Horizon School, 3430 McManus Avenue, approximately 950 feet to the west.

Other nearby schools include:

- Willows Community School, 8509 Higuera Street, approximately 2,000 feet to the southwest.

While portions of the Project would be operational during school hours, the Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, further analysis of this issue in an EIR is required.

**Response d:**

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. Typically, the types of land uses on the Project Site (residential and commercial) are not anticipated to represent a hazard to the public or environment. There are no identified hazards on the Project Site, but there are Field Points and LUST (Leaking Underground Storage Tank) Cleanup Sites that were closed, across La Cienega Boulevard at the Chevron Station, 3300 La Cienega Boulevard. There is also a LUST Cleanup Site in remediation at 3077 La Cienega Boulevard to the north of the Site.<sup>25</sup> The potential exists for the Project Site and/or any number of hazardous materials sites near the Project Site, including sites up-gradient, to be listed according to Government Code Section 65962.5. This issue will be analyzed further in an EIR.

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<sup>24</sup> NavigateLA, Schools Layer: <http://navigatela.lacity.org/index01.cfm>.

<sup>25</sup> CA State Water Resources Control Board: <http://geotracker.waterboards.ca.gov/>

**Responses e and f:**

A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. Santa Monica Airport is approximately 4 miles west of the Project Site. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response g:**

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in an EIR.

**Response h:**

A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.<sup>26</sup> The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element.<sup>27</sup> Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Unless			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact

**IX. Hydrology And Water Quality.** Would the project:

- a. Violate any water quality standards or waste discharge requirements?
- b. Substantially deplete groundwater supplies or interfere 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 land uses for which permits have been granted)?

<sup>26</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

<sup>27</sup> City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas in the City of Los Angeles, Exhibit D.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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"/>

**Response a:**

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the development of residential and commercial uses on land that is currently developed. The Project has the potential to alter the existing surface water runoff drainage pattern and rainfall absorption, causing a net increase of rates

of storm water discharge. The potential to violate any water quality standards or waste discharge requirements will be further analyzed in an EIR.

**Response b:**

A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City's existing water supply and infrastructure. It is possible that there would be an increase in the amount of impervious surfaces located on the Project Site upon completion of project construction, and in addition, the construction would include excavation and could possibly require dewatering at the Site. The EIR will provide additional analysis to assess the potential to result in hydrology and water quality impacts, including the need for dewatering the Site, and any required mitigation measures.

**Response c:**

A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Site. The Project Site is currently developed and has minimal ornamental trees and landscaping. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. If not properly designed, the Project could result in erosion and siltation during construction and operation. The EIR will provide additional analysis to assess the potential to result in hydrology and water quality impacts, and the use of best management practices during construction.

**Response d:**

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the Site and reduce off-site flows. The EIR will provide additional analysis to assess the potential to result in hydrology and water quality impacts, including the changes in on-site drainage patterns, and the available storm drain system capacity.

**Response e:**

A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeds the capacity of the storm drain system serving a Project Site, or if the proposed project would introduce substantial new sources of polluted runoff. As with any construction project, construction could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and

dust generated on the Site; and 3) construction activities and equipment. The EIR will provide additional analysis to assess potential to result in hydrology and water quality impacts, including the adequacy of the proposed drainage plan, best management practices (BMPs), as well as existing water quality regulations and standards.

**Response f:**

As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. Therefore, the EIR will provide additional analysis to assess the potential to result in hydrology and water quality impacts,

**Response g-h:**

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods. The Site is not located within a City-designated 100-year or 500-year flood plain.<sup>28</sup> As the Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

**Response i:**

A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. The Project Site is located approximately 6.5 miles southwest of and downslope from the Hollywood Reservoir.<sup>29</sup> As such, the EIR will further analyze impacts related to potential inundation from the failure of a levee or dam.

**Response j:**

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, and is located at least 6 miles from the Pacific Ocean and is not near any major water bodies. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Site. The Site is in an

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<sup>28</sup> City of Los Angeles, *Safety Element of the General Plan, 100-Year and 500-Year Flood Plains in the City of Los Angeles, Exhibit F*.

<sup>29</sup> City of Los Angeles, *Safety Element of the General Plan, Inundation and Tsunami Hazard Areas in the City of Los Angeles, Exhibit G*.

urbanized portion of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No further analysis of this issue is required.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**X. Land Use And Planning.** Would the project:

- a. Physically divide an established community?
- b. Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

**Response a:**

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project is not of a size or type to physically divide a community. Therefore no impact would occur and no further analysis of this issue is required.

**Response b:**

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions by the City. The EIR will provide additional analysis to assess the consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the West Adams CP) or regional plans and policies (such as the SCAQMD and Metro CMP).

**Response c:**

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site has previously developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural

Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that apply to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**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?    ■
- 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?    ■

**Response a:**

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area,<sup>30</sup> or a City-designated Mineral Resource Zone 2 Area (MRZ-2).<sup>31</sup> The nearest oil area is the Inglewood Oil Field to the south around Baldwin Hills. The Project would have no impact with respect to loss of availability of a known regionally-important mineral resource. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

**Response b:**

A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that

<sup>30</sup> NavigateLA, Geotechnical – Oil Wells, Oil Fields layer: <http://navigatela.lacity.org/index01.cfm>.

<sup>31</sup> City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area identified has been developed with structures and is inaccessible for mining extraction.<sup>32</sup> Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XII. Noise.** Would the project:

- a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?
- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?
- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

**Response a:**

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Site to exceed noise level standards set forth in the City of Los Angeles General

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<sup>32</sup> City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.

Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Construction would require the use of construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City's Noise Ordinance. Existing on-site noise sources include the existing office and light industrial uses. The Project would increase the activities that would occur on the Site and noise levels from on-site sources also have the potential to increase during Project operation. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise. During project operation, ground-borne vibration may also emanate from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact may occur if the operation would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, this issue will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project or on a periodic basis during the operation of the proposed project. As discussed above, construction activity has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project. As discussed under Checklist Question VII(e), the Project Site is not located within an airport land use plan area or within two miles of a public

airport or public use airport. Santa Monica Airport is located approximately 4 miles west of the Site. The Project would not expose people residing or working in the project area to excessive noise levels from an airport use. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

**Response f:**

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question VII(f), there are no private airstrips in the vicinity of the Site. The Project would not expose people residing or working in the area to excessive noise levels from an airport use. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Mitigation Incorporated	Potentially Significant Unless 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)?
- b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?
- c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

**Response a:**

A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population. Therefore, this issue will be further analyzed in an EIR.

**Response b:**

A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would not displace any housing since there is no housing on the Site. Further, the Project would develop

residential units. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

#### **Response c:**

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would not displace a substantial number of people necessitating the construction of replacement housing elsewhere. There is no housing on the Site. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIV. Public Services.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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?
- b. Police protection?
- c. Schools?
- d. Parks?
- e. Other governmental services (including roads)?

#### **Response a:**

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. The Project is served by:

- Fire Station No. 68, located at 50233 Washing Boulevard, approximately 1.65 miles from the Site.
- Fire Station No. 94, located at 4470 Coliseum Street, approximately 1.95 miles from the Site.
- Fire Station No. 58, located at 1566 South Robertson, approximately 2.05 miles from the Site.

The Project would increase the intensity of development at the Project Site, and therefore, the potential impact of the Project on fire protection services will be analyzed in the EIR.

**Response b:**

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is within Reporting District 311 of the Southwest Divisions Police Station, located at 1546 Martin Luther King Boulevard.<sup>33</sup> The Project would increase the intensity of development at the Project Site, and therefore, the potential impacts of the Project on police protection services will be analyzed in the EIR.

**Response c:**

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area. Thus, the potential impact of the Project on school facilities will be analyzed in the EIR.

**Response d:**

A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. The EIR will evaluate the Project's on-site open space and recreational amenities and will determine the impacts on park facilities.

**Response e:**

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site, necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the Los Angeles Public Library (LAPL). The Baldwin Hills Branch located at 2906 La Brea Avenue and the

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<sup>33</sup> LAPD: [http://www.lapdonline.org/southwest\\_community\\_police\\_station](http://www.lapdonline.org/southwest_community_police_station)

Robertson Branch located at 1719 Robertson Boulevard are the libraries nearest the Site. Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. The EIR will evaluate the Project's impacts upon library facilities.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### XV. Recreation.

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

##### **Response a:**

A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new residential uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV, Parks). While on-site open space and recreational amenities would be included within the project designs, the Project has the potential to increase demands upon several public park facilities located within the project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

##### **Response b:**

The Project has the potential to increase demands upon recreational facilities that may require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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## XVI. Transportation/Circulation.

Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?
- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

### Response a:

A significant impact would occur if the project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F, by 0.020 or more when the final LOS is D, or by 0.040 or more when the final LOS is C. The potential impacts of the Project are currently being evaluated in accordance with the assumptions, methodology, and procedures approved by LADOT. The Project is near the border with the City of Culver City. Any study intersection in that jurisdiction would be evaluated according to its own methodology. It is unknown at this time

whether the Project may result in a potentially significant traffic impact during operation and construction. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (MTA) thresholds are exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

**Response d:**

A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. No incompatible use would occur. The driveway width and queuing length will be evaluated to ensure there is adequate space to accommodate the vehicles for the Project. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic and population due to the proposed residential units and patronage of the commercial uses on-site could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore, the EIR will provide additional analysis to assess the potential to result in traffic impacts.

**Response f:**

A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. The Project is adjacent to the Metro Expo Line Station and adjacent bike path. The potential of the Project to conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

Potentially Significant Impact	Mitigation Incorporated	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVII. Utilities.** Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?
- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a:**

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the State's wastewater treatment requirements which, in the project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The potential of the Project to exceed wastewater treatment requirements of the LARWQCB will be analyzed in the EIR.

**Response b:**

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the site would be exceeded. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. It is not known whether the Project may result in a significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site. Thus, potential impacts to the public water and wastewater infrastructure system will be analyzed within the scope of the EIR.

**Response c:**

A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded. The potential of the Project to result in the construction of new or expanded stormwater facilities will be analyzed in the EIR.

**Response d:**

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to consume an increase in water as compared to the existing uses on the Site. Given the Project's size, a Water Supply Assessment by the Los Angeles Department of Water and Power (LADWP) would be conducted to

evaluate the water supply's availability to serve the Project. Any potential impacts with respect to water supply will be analyzed within the scope of the EIR.

**Response e:**

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVI(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, potential impacts related to wastewater treatment plant capacity and availability will be analyzed within the scope of the EIR.

**Response f:**

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

**Response g:**

Solid waste management is guided by the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, a less than significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Potentially Significant Unless 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 fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).
- c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

**Response a:**

Based on the analysis contained in this Initial Study, the project has the potential to result in significant impacts with regard to the issues addressed herein. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

**Response b:**

The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use and planning, noise, population and housing, transportation

and traffic, and utilities and service systems resulting from the project in conjunction with the applicable related projects will be analyzed and documented in an EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts

**Response c:**

Construction and operation of the project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.

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

As noted above, the lead agency has determined that the proposed project may result in a significant effect on the environment, and an environmental impact report is required.

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PREPARED BY	TITLE	TELEPHONE	DATE
Sergio Ibarra	Planning Associate	213-978-1333	0/28/2015

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