



## Sepulveda Palms Project

Case Number: ENV-2018-2993-EIR

**Project Location:** 3443 South Sepulveda Boulevard, Los Angeles, California, 90034

**Community Plan Area:** Palms – Mar Vista – Del Rey

**Council District:** CD 5 – Paul Koretz

**Project Description:** The Project proposes demolition of an approximately 37,900 square-foot commercial building and associated surface parking lot, and the construction of a seven-story mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The total proposed floor area is approximately 430,864 gross square feet. Of the 409 apartment units, 11 percent of the base density of 303 units (or 34 units) would be reserved for Very Low Income households. Vehicle parking would be provided in three subterranean levels, which would accommodate 844 spaces. Bicycle parking would be provided on the ground floor, which would accommodate 207 long-term and 48 short-term spaces. The proposed building would reach a height of approximately 86 feet above grade.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

EcoTierra Consulting

**APPLICANT:**

Balboa Cove Group, LP

**August 2019**

# Initial Study

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# Initial Study

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## Executive Summary

**Project Title:** Sepulveda Palms Project  
**Environmental Case Number:** ENV-2018-2993-EIR  
**Related Cases:** CPC-2018-2992-DB-MCUP-SPR

**Project Location:** 3443 South Sepulveda Boulevard  
**Community Plan Area:** Palms – Mar Vista – Del Rey  
**Council District:** CD 5 – Paul Koretz

**Lead City Agency:** Department of City Planning  
**Staff Contact Name and Address:** Jason McCrea, Planning Assistant  
221 N. Figueroa St., Suite 1350  
Los Angeles, CA. 90012

**Phone Number:** (213) 847-3672

**Applicant Name and Address:** Jack Nourafshan  
Balboa Cove Group, L.P.  
6420 Wilshire Boulevard, Unit 1500  
Los Angeles, CA 90048

**Phone Number:** (323) 653-3777

**General Plan Designation:** Neighborhood Commercial

**Zoning:** C2-1VL and R4-1

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### PROJECT DESCRIPTION:

The Project proposes demolition of the existing 37,900-square-foot commercial building and associated surface parking lot, and the construction of a seven-story mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The total proposed floor area is approximately 430,864 gross square feet. Of the 409 apartment units, 11 percent of the base density of 303 units (or 34 units) would be reserved for Very Low Income households. The Project would provide approximately 50,863 square feet of open space for the future residents. Vehicle parking would be provided in three subterranean levels, which would accommodate 844 spaces. The Project would be accessed from South Sepulveda Boulevard and Palms Boulevard.

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Bicycle parking would be provided on the ground floor, which would accommodate 207 long-term and 48 short-term spaces. The proposed building would reach a height of approximately 86 feet above grade.

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### **ENVIRONMENTAL SETTING:**

The Project Site is located at 3443 South Sepulveda Boulevard, in the Palms-Mar Vista-Del Ray Community Plan area of the City of Los Angeles, approximately 3.8 miles east of the Pacific Ocean. The Project Site is bounded by South Sepulveda Boulevard to the east, the I-405 freeway to the west, existing parking and office land uses to the north, and Palms Boulevard to the south. While the Project Site is relatively flat, Sepulveda Boulevard slopes up toward the south, adjacent to the eastern boundary of the Project Site. Furthermore, the Project is located within a Bureau of Engineering (BOE) Special Grading Area.

A commercial building and surface parking lot are currently developed on the Project Site. The existing single-story building contains approximately 37,900 square feet of floor area. Currently, the commercial building is operating as a college student art studio associated with University of California, Los Angeles; the building was previously operating as a supermarket. *Tree Evaluation Report* (dated January 12, 2016 and updated April 16, 2018, included as Appendix A to this Initial Study) identified eight queen palms (*Syagrus romanzoffiana*) on the eastern corner of the Project Site along Palms Boulevard.<sup>1</sup> There are no street trees on or adjacent to the Project Site. The Project Site is currently accessed from driveways along South Sepulveda Boulevard and Palms Boulevard.

Commercial land uses, including a grocery store, restaurants, pharmacy, bank, and other retail stores, are located to the east of the Project Site, across Sepulveda Boulevard. An office building and associated parking structure adjoins the Project Site to the north. A vacant paved lot, single-family homes, and two-story apartment buildings are located to the south of the Project Site, across Palms Boulevard. The San Diego Freeway (I-405) adjoins the property to the west. Charnock Road Elementary School is located approximately 430 feet to the south, on the east side of Sepulveda Boulevard.

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**Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.)**

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<sup>1</sup> *BonTerra Psomas, Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, January 12, 2016; and Psomas, Update to the Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, April 16, 2018.*

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**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

Yes.

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

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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.

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

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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.

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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.

Jason McCrea

Planning Assistant

**PRINTED NAME**

**TITLE**



213-847-3672

**SIGNATURE**

**TELEPHONE NUMBER**

## EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "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:

- a) Earlier Analysis Used. Identify and state where they are available for review.
- b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

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

# Attachment A

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## Project Description

### 1. Project Summary

The Project proposes the demolition of an approximately 37,900 square-foot commercial building and associated surface parking lot, and the construction of a seven-story, mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The total proposed floor area is approximately 430,864 gross square feet. Of the 409 apartment units, 11 percent of the base density of 303 units (or 34 units) would be reserved for Very Low Income households. Vehicle parking would be provided within three subterranean levels, which would accommodate 844 spaces. Bicycle parking would be provided on the ground floor, which would accommodate 207 long-term and 48 short-term spaces. The proposed building would reach a height of approximately 86 feet above grade.

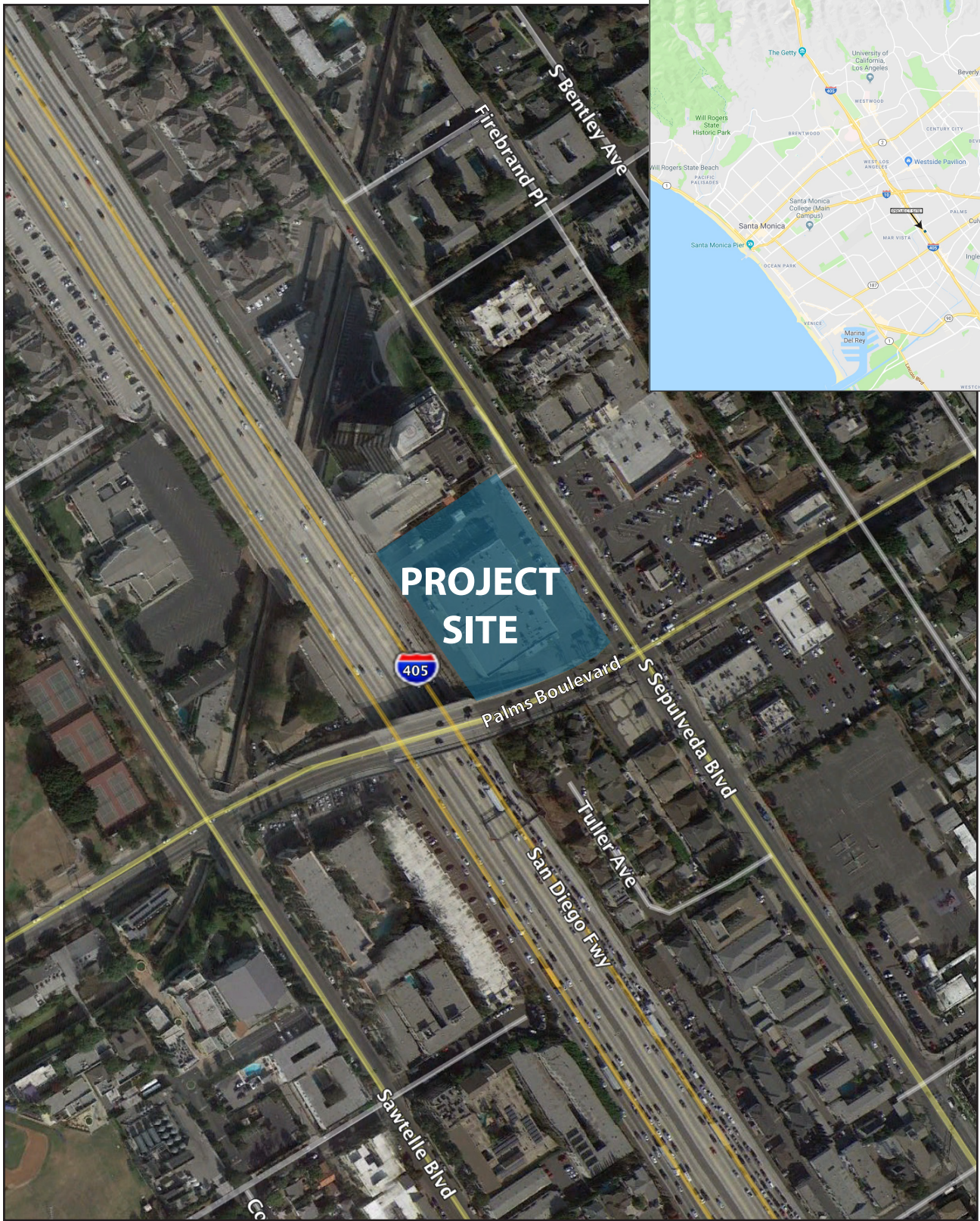
### 2. Environmental Setting

#### a) Project Location

The Project is located at 3443 South Sepulveda Boulevard, in the Palms – Mar Vista – Del Rey community of the City of Los Angeles (the “City”) and is associated with Assessor Parcel Number 4251-015-006 (the “Project Site”). The Project Site is approximately 2.78 acres (120,889 square feet) and located at the northwest corner of Sepulveda Boulevard and Palms Boulevard. A college student art studio, occupying a single-story commercial building formerly operating as a supermarket, and surface parking lot currently occupy the Project Site (see Figure A-1, Vicinity and Regional Map).

Regional access to the Project Site is provided by the San Diego Freeway (I-405), adjacent to the site to the west, and the Santa Monica Freeway (I-10), approximately 5,000 feet (0.9 miles) to the north. Local access to the Project Site is provided by Sepulveda Boulevard and Palms Boulevard. The Santa Monica Big Blue Bus (Line 17) and the Culver City Bus (Lines 6 and 6R) provide local bus service in the Project Site area along Sepulveda Boulevard and Palms Boulevard. Metro provides local bus service (Lines 33 and 733) along Venice Boulevard, south of the Project Site. The Project Site is approximately 3.8 miles east of the Pacific Ocean.





 Project Site

Source: Google Earth, June 2018.



Figure A-1  
Vicinity and Regional Map



## b) Existing Conditions

A commercial building and surface parking lot are currently developed on the Project Site. The existing single-story building contains approximately 37,900 square feet of floor area. Currently, the commercial building is operating as a college student art studio associated with University of California, Los Angeles; the building was previously operating as a supermarket. A *Tree Evaluation Report* (dated January 12, 2016 and updated April 16, 2018, included as Appendix A to this Initial Study) identified eight queen palms (*Syagrus romanzoffiana*) on the eastern corner of the Project Site along Palms Boulevard.<sup>1</sup> There are no street trees on or adjacent to the Project Site.

The Project Site has a General Plan land use designation of Neighborhood Commercial in the Palms – Mar Vista – Del Rey Community Plan. The Los Angeles Municipal Code (LAMC) establishes the zoning for the Project Site as C2-1VL (Commercial – Very Limited Height District) and R4-1 (Multiple Dwelling –Height District No. 1). The C2 Zone, which comprises approximately 85 percent of the Project Site, allows a range of commercial land uses, including retail, restaurants, service stations, churches, and schools. The R4 zone, which comprises the remaining approximately 15 percent of the Project Site, allows a range of residential and other land uses, including single-family and multi-family residences, churches, schools, and child care centers.

The Project Site is also located within an Urban Agricultural Incentive Zone and the West Los Angeles Transportation Improvement and Mitigation Specific Plan area.

The Project is located in an Urban Agriculture Incentive Zone. The Urban Agriculture Incentive Zone is a State program adopted by the State Legislature in 2013. The Urban Agriculture Incentive Zone includes any land designated as being eligible for the Urban Agriculture Incentive Zone Act, in accordance with California Government Code Sections 51040 - 51042 and County of Los Angeles Planning and Zoning Code Sections 22.52.3400, et seq. This program aims to incentivize urban agriculture in urbanized areas in California by offering reduced property tax assessments in exchange for converting vacant or unimproved property to an agricultural use through a contract agreement. The Project does not propose any agricultural use nor is there currently any agriculture occurring on the Project Site.

The Project Site is also within the West Los Angeles Transportation Improvement and Mitigation Specific Plan. The WLA TIMP was adopted on March 8, 1997 with the intent to, among other things: “Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new

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<sup>1</sup> *BonTerra Psomas, Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, January 12, 2016; and Psomas, Update to the Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, April 16, 2018.*

development within the WLA TIMP Area.” Therefore, clearance of any transportation improvements or mitigation measures will be required from the Los Angeles Department of Transportation (LADOT).

### **c) Surrounding Land Uses**

The Project is located in the Palms-Mar Vista-Del Rey community of the City. Commercial land uses, including a grocery store, restaurants, pharmacy, bank, and other retail stores, are located to the east of the Project Site, across Sepulveda Boulevard. An office building and associated parking structure adjoins the Project Site to the north. A vacant paved lot, one- and two-story single-family homes, and two-story apartment buildings are located to the south of the Project Site, across Palms Boulevard. The San Diego Freeway (I-405) adjoins the property to the west. Charnock Road Elementary School is located approximately 430 feet to the south, on the east side of Sepulveda Boulevard.

The I-405 freeway abuts the Project Site to the west. Palms Boulevard ascends into a bridge that crosses over the I-405 freeway to the south and west of the Project Site. Sepulveda Boulevard is classified as a Boulevard II and Palms Boulevard is an Avenue II.

## **3. Project Characteristics**

### **a) Project Overview**

The Project would involve the demolition of the existing building and surface parking lot, and the construction of a seven-story, mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The total proposed floor area is approximately 430,846 gross square feet. Of the 409 apartment units, 11 percent of the base density of 303 units (34 units) would be reserved for Very Low Income households. The Project is utilizing Parking Option 1 in conjunction with the Density Bonus request. Vehicle parking would be provided within three subterranean levels, which would accommodate 844 spaces. Bicycle parking would be provided on the ground floor, which would accommodate 207 long-term and 48 short-term spaces. The proposed building would reach a height of approximately 86 feet above grade. Project plans and renderings are shown on Figures A-2 through A-19. Table A-1 (Project Development Summary) summarizes the proposed land uses.

**Table A-1  
Project Development Summary**

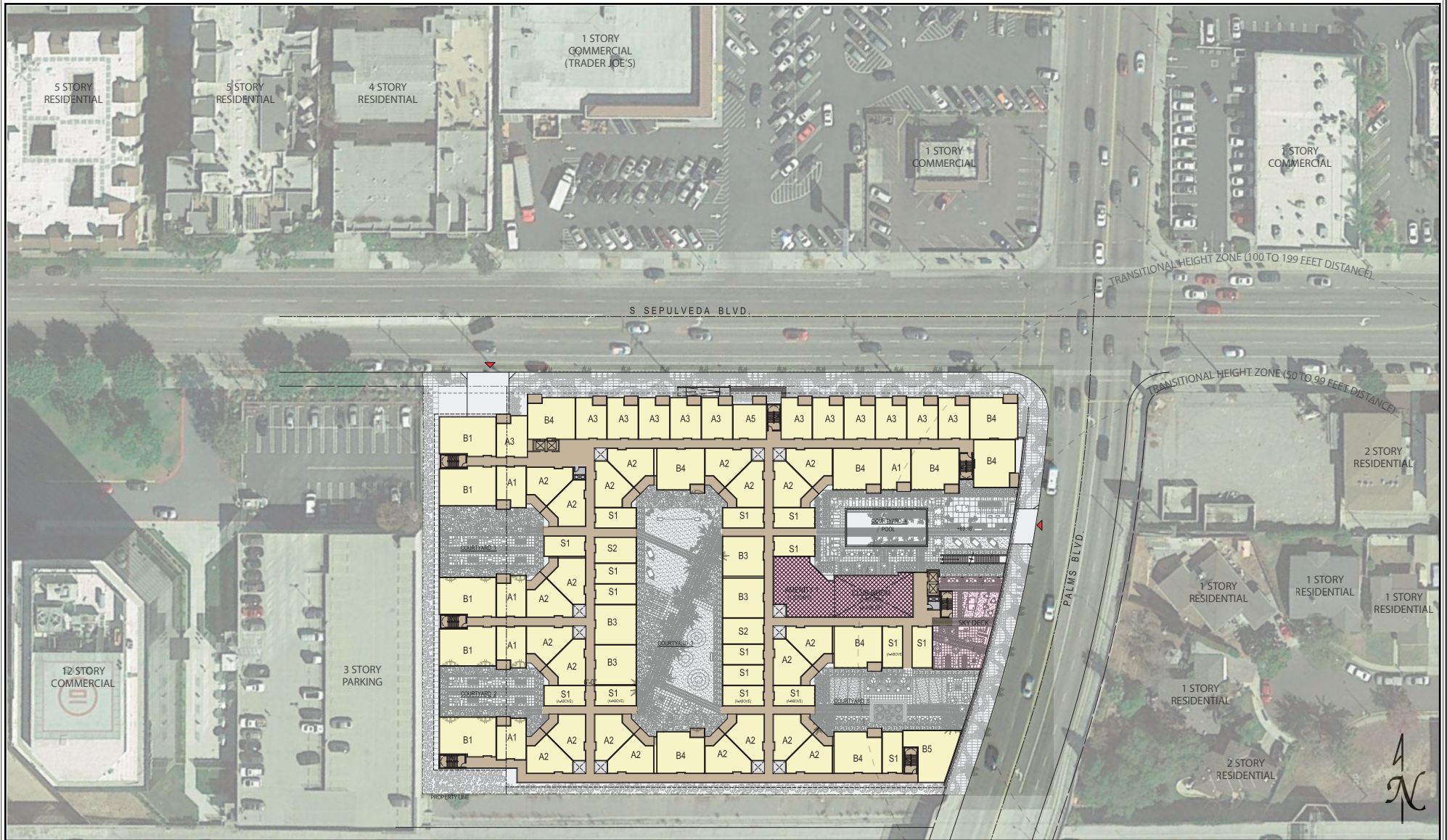
Land Use	Amount
<b>Residential</b>	
Studio	54 du
One bedroom	251 du
Two bedrooms	104 du
<i>Total Residential Units</i>	<i>409 du</i>
<b>Open Space</b>	
Private Open Space	13,500 sf
Outdoor Common Space	34,963 sf
Indoor Common Space	2,400 sf
<i>Total Open Space</i>	<i>50,863 sf</i>
<b>Commercial/Retail</b>	
General Retail	44,900 sf
Restaurant	15,100 sf
<i>Total Commercial/Retail Space</i>	<i>60,000 sf</i>
<i>du = dwelling units; sf = square feet</i>	
<i>Source: Humphreys &amp; Partners Architects, L.P., 2018.</i>	

The Project's retail and restaurant land uses would be located on the ground level fronting Sepulveda Boulevard, with some retail parking spaces located on the western edge of the ground floor. Parking for the retail and residential land uses would be provided within three subterranean levels, and on the second floor. Residential uses would primarily be located on the third through seventh levels, with the exception of four units that would be located on the second level fronting Palms Boulevard. The Project proposes a floor area ratio (FAR) of 3.56:1.

The Project would include 34 affordable housing units for Very Low Income households. The Project Applicant is requesting on-menu and off-menu housing incentives associated with a Density Bonus request. The Project is subject to Site Plan Review and includes a request for a Master Conditional Use Permit for the sale and dispensing of alcohol for on-site and off-site consumption. See the Requested Permits and Approvals discussion below for more information regarding the discretionary and ministerial requests that are part of the Project.







Source: Humphreys & Partners Architects, L.P., December 2018.



S SEPULVEDA BLVD.



Source: Humphreys & Partners Architects, L.P., December 2018.

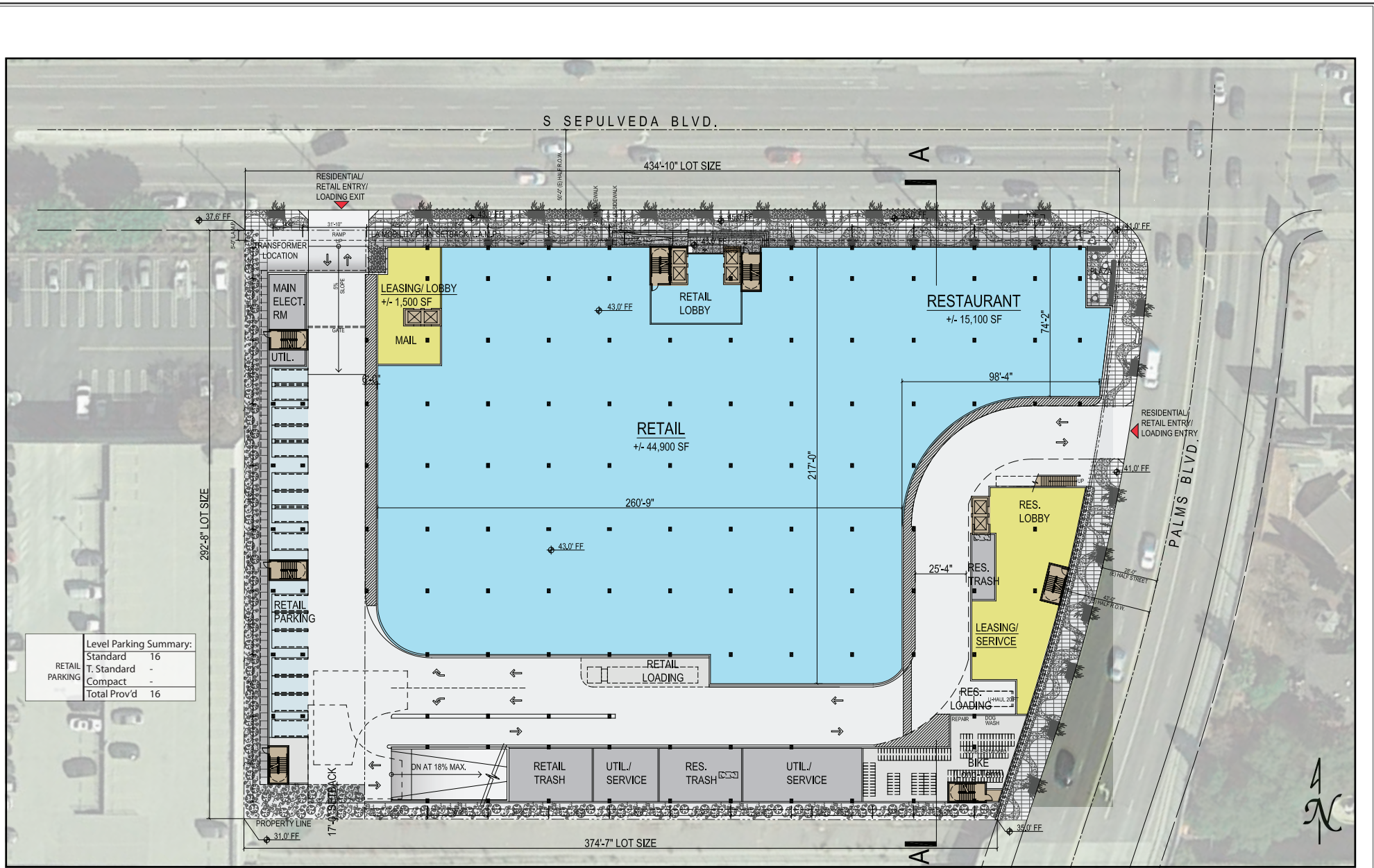


S SEPULVEDA BLVD.



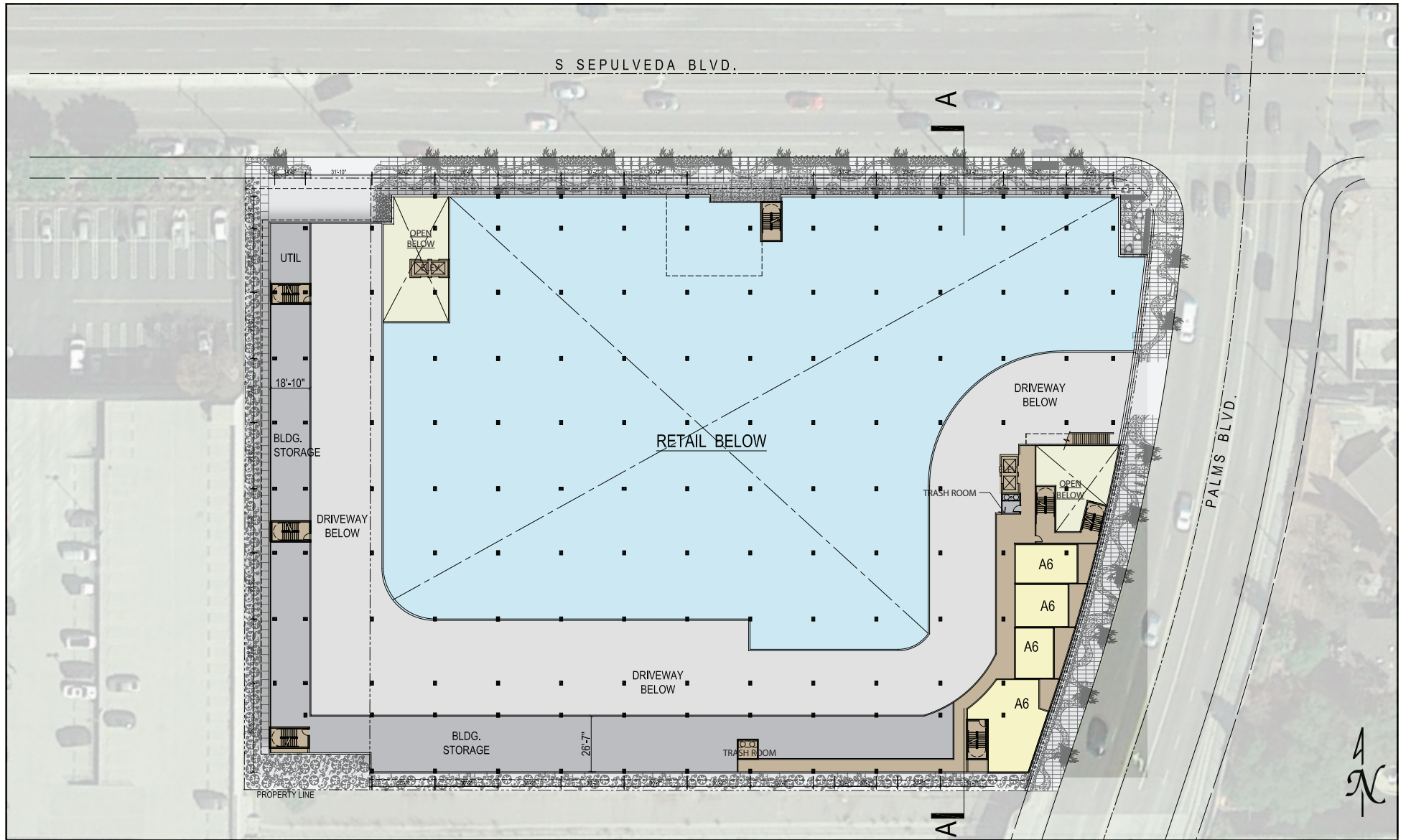
Source: Humphreys & Partners Architects, L.P., December 2018.





Level Parking Summary:	
RETAIL PARKING	Standard 16
	T. Standard -
	Compact -
	Total Prov'd 16

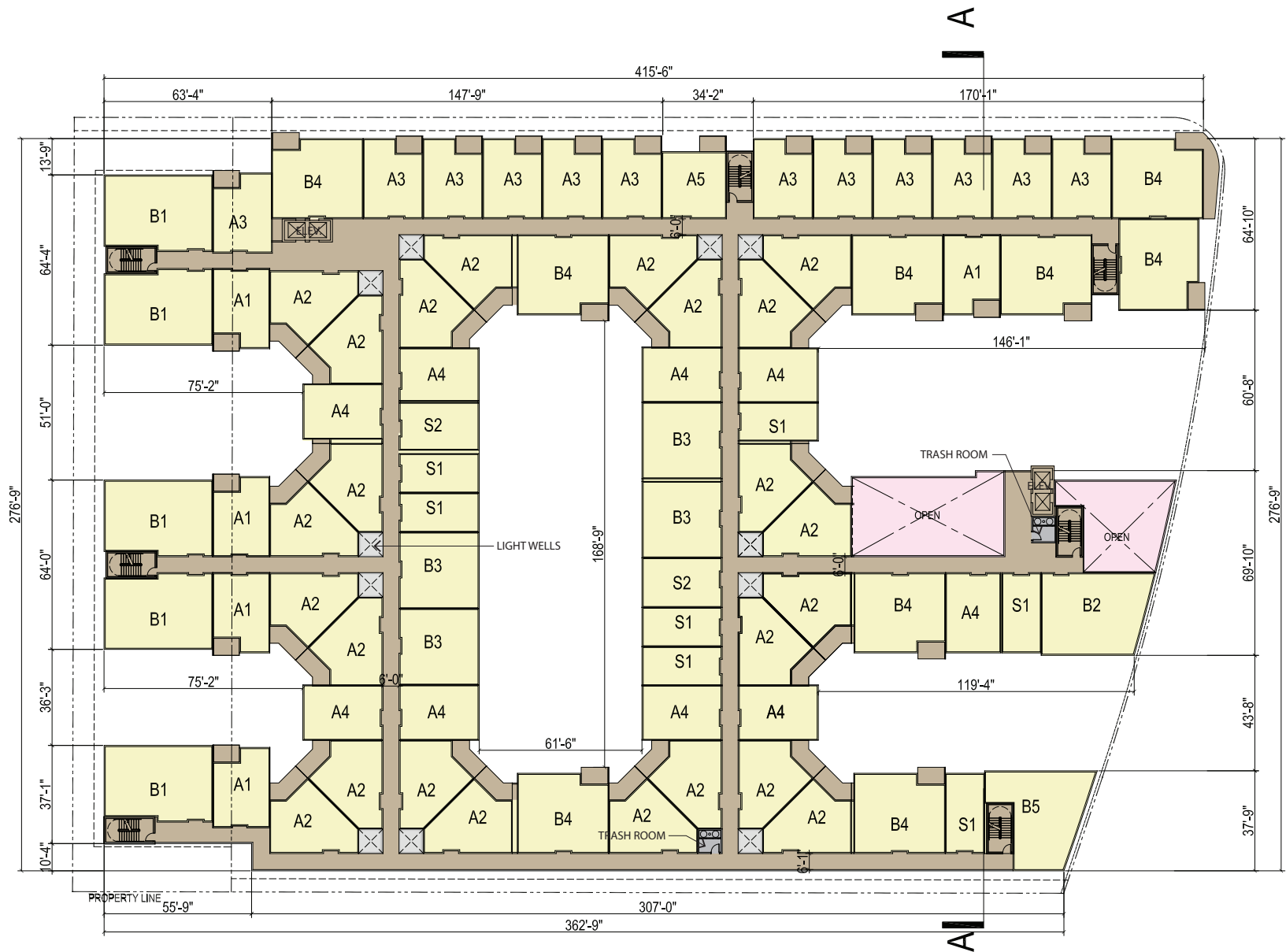
Source: Humphreys & Partners Architects, L.P., December 2018.



Source: Humphreys & Partners Architects, L.P., December 2018.







Source: Humphreys & Partners Architects, L.P., December 2018.



Source: Humphreys & Partners Architects, L.P., December 2018.







Source: Humphreys & Partners Architects, L.P., 2019.





Source: Humphreys & Partners Architects, L.P., 2019.





5 VIEW NORTH ALONG RESTAURANT AT SEPULVEDA BLVD.

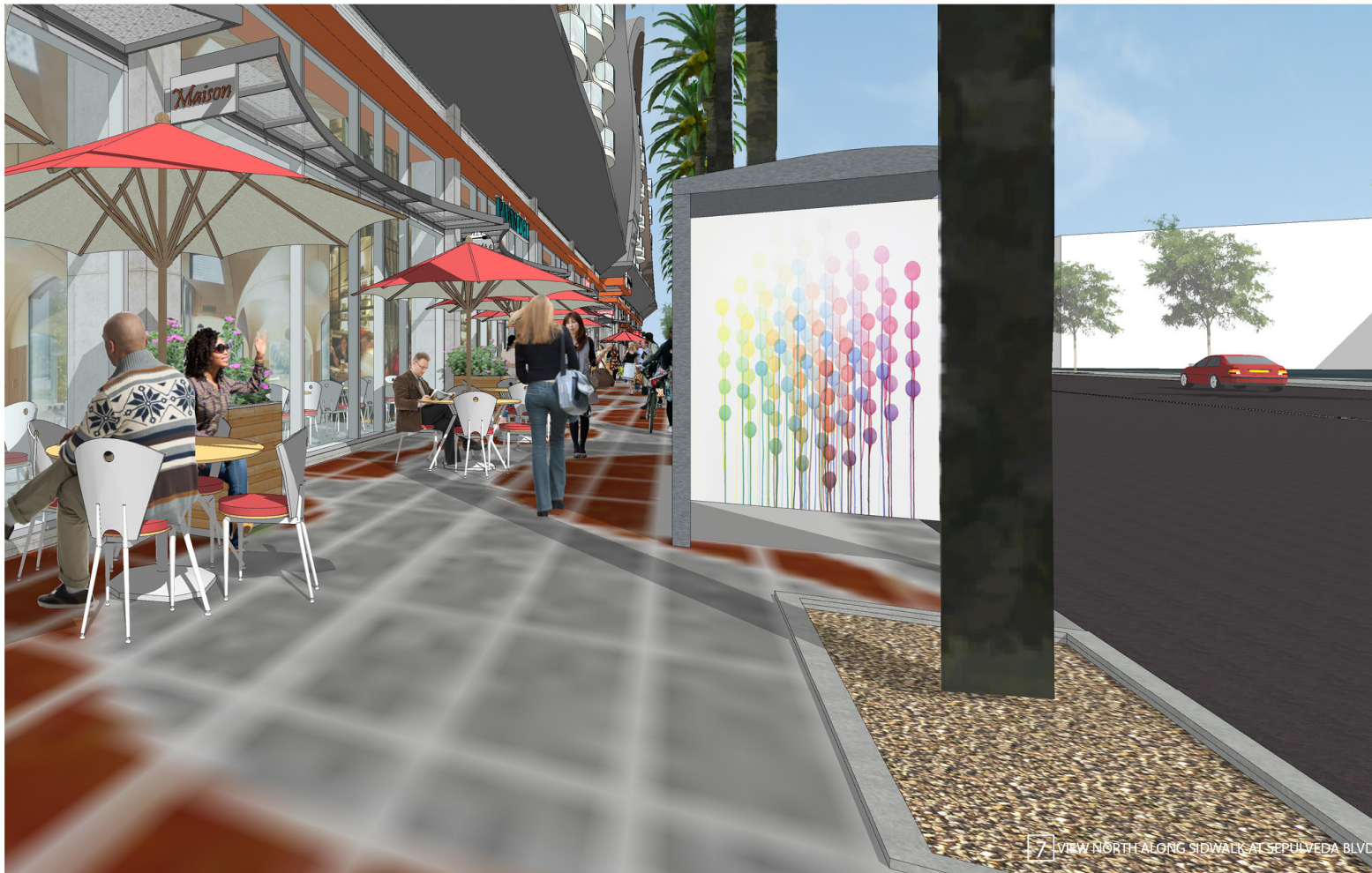


6 NORTH CORNER VIEW AT SEPULVEDA & PALMS



Source: Humphreys & Partners Architects, L.P., 2019.





7 VIEW NORTH ALONG SIDEWALK AT SEPULVEDA BLVD.



Source: Humphreys & Partners Architects, L.P., 2019.



8 INTERSECTION AT SEPULVEDA & PALMS

Source: Humphreys & Partners Architects, L.P., 2019.



Figure A-17  
Rendering View at the Intersection of Sepulveda and Palms





9 RETAIL ENTRY ALONG SEPULVEDA BLVD.



10 SIDEWALK VIEW ALONG RETAIL ENTRY



Source: Humphreys & Partners Architects, L.P., 2019.



Source: Humphreys & Partners Architects, L.P., March 2018.

## **b) Design and Architecture**

The Project design is comprised of curvilinear frames, canopies, and accents. Along the I-405, the Project projects a large, glass façade with staggered mullions and vertical supports. Internal lighting effects would be used to create a slowly transitioning pattern of color on the western façade, where the Project faces the 405 freeway. Soft lighting will wash the interior walls to create the effect and all light fixtures would be shielded to avoid light or glare spillover.

The retail uses along Sepulveda Boulevard and Palms Boulevard would be separated from the housing above with a pronounced canopy. A transparent glass wall would connect the ground-level leasing center with the fitness center above, culminating in the skydeck at the seventh floor, with a canopy and framing. This design is intended to “ground” the building to the street and emphasize the pedestrian entry to the apartments.

## **c) Open Space and Landscaping**

The Project would require 43,500 square feet of open space pursuant to LAMC Section 12.21 G.2, based on the total number and type of units. The Project would provide approximately 50,863 square feet of open space (see Table A-1, above) and residential amenities in several distinct areas. The open space would include approximately 13,500 square feet of private open space, 34,963 square feet of outdoor common space, and 2,400 square feet of indoor common space. Five courtyards would be located on the third level and a sky deck would be provided on the seventh level. The Project’s various amenities would include including a swimming pool, clubroom, and courtyards. Approximately 270 of the residences would include private balconies of approximately 50 square feet in size.

## **d) Access, Circulation, and Parking**

Pedestrian access to the Project’s various components would be provided from Sepulveda Boulevard and Palms Boulevard. Pedestrian access to the residences also would be accessible from Sepulveda Boulevard and Palms Boulevard, with Palms Boulevard providing the primary access to the leasing office/lobby. The parking levels would be accessed from both Sepulveda Boulevard and Palms Boulevard.

The Project is utilizing Parking Option 1 in conjunction with the Density Bonus request. Based on the proposed unit mix, a total of 844 parking spaces would be required. The Project would provide the required 844 parking spaces, comprised of 513 parking spaces for residential uses and 331 parking spaces for commercial uses. In addition, the Project would provide five percent of its required and provided parking spaces (or 42 spaces) with chargers for electric vehicles and would provide 20 percent of its required and

provided parking spaces (or 69 spaces) pre-wired for future electric vehicle charging. Table A-2 (Vehicle Parking) provides a summary of the parking that would be provided on the Project.

**Table A-2  
Vehicle Parking**

Use	Amount	Parking Ratio	Number of Spaces
<i>Residential</i>			
Studio	54 du	1 sp/du	54
One Bedroom	251 du	1 sp/du	251
Two Bedroom	104 du	2 sp/du	208
<b>Residential Required Parking</b>			<b>513</b>
<b>Residential Parking Provided</b>			<b>513</b>
<i>Commercial</i>			
General Retail	44,900 sf	4 sp/1,000 sf	180
Restaurant	15,100 sf	10 sp/1,000 sf	151
<b>Commercial Required Parking</b>			<b>331</b>
<b>Commercial Parking Provided</b>			<b>331</b>
<b>Total Required Parking</b>			<b>844</b>
<b>Total Project Parking Provided</b>			<b>844</b>
<i>du = dwelling units; sf = square feet; sp = spaces</i>			
<i>Source: Humphreys &amp; Partners Architects, L.P., 2018.</i>			

In addition, the Project would provide 255 bicycle parking spaces, comprised of 60 bicycle spaces for commercial uses (including 30 short-term and 30 long-term spaces) and 195 spaces for the residential uses (including 18 short-term and 177 long-term spaces), to meet LAMC requirements. Table A-3 (Bicycle Parking) provides the bicycle parking calculations for the Project.

**Table A-3  
Bicycle Parking**

Use	Parking Ratio		Project		Total Required
	Short-term	Long-term	Short-term	Long-term	
Residential					
First 25 du	1 sp/10 du	1 sp/1 du	2.5	25	<b>27.5</b>
75 du	1 sp/15 du	1 sp/1.5 du	5.0	50	<b>55</b>
100 du	1 sp/20 du	1 sp/2 du	5.0	50	<b>55</b>
Other 209 du	1 sp/40 du	1 sp/4 du	5.2	52	<b>57.2</b>
Commercial	1 sp/2,000 sf	1 sp/2,000 sf	30	30	<b>60</b>
<b>Total Project Bicycle Parking</b>			<b>48</b>	<b>207</b>	<b>255</b>
<i>Notes: du = dwelling units; sf = square feet; sp = spaces</i>					
<i>Source: Humphreys &amp; Partners Architects, L.P., 2018.</i>					

The Project has been designed to be pedestrian oriented with ground floor commercial uses facing both street frontages. The commercial uses would consist of several establishments, each with its own entrance directly from the street.

The Project may require street dedications or easements to accomplish required rights-of-ways to meet the Mobility Plan 2035. Sepulveda Boulevard currently has a 50-foot half right-of-way width that includes a 37-foot half roadway and a 13-foot sidewalk. The design standard for Sepulveda Boulevard, as a Boulevard II, requires a 110-foot full right-of-way width and a 40-foot half right-of-way width that includes a 55-foot half roadway and a 15-foot sidewalk. This would require a five-foot dedication.

Palms Boulevard currently has a 42-foot half right-of-way width that includes a 31.5-foot half roadway and a 10.5-foot sidewalk. The design standard for Palms Boulevard, as an Avenue II, requires an 86-foot full right-of-way width and a 43-foot half right-of-way width that includes a 28-foot half roadway and a 15-foot sidewalk. According to Los Angeles Bureau of Engineering, Sepulveda Boulevard would require a five-foot dedication and a three-foot widening and Palms Boulevard would require a one-foot dedication and no widening as part of the Project.

### **e) Lighting and Signage**

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

### **f) Site Operation and Security**

Given the residential uses on the Project Site, the Project would operate 24 hours per day. Business hours for commercial operations would likely be within the range of 6:00 AM to 2:00 AM, depending on the requirements of the individual commercial use. The Project would provide security features including, but not limited to, controlled access to residential areas and video surveillance.

### **g) Affordable Housing and Density Bonus**

The Project would reserve 11 percent of the base residential density (34 residential units) for Very Low Income households and, therefore, qualify for a 35 percent density bonus and up to three on-menu or off-menu incentives as set forth in the State Density Bonus law (California Government Code Section 65915) and the City's Density Bonus Ordinance (LAMC Section 12.22 A.25). The requested incentives include: (1) an on-menu incentive for averaging of floor area across the C2-1VL and R4-1 Zones; (2) an off-menu incentive



to increase the maximum allowable FAR to 3.56:1 for the entire Project Site, in lieu of the otherwise permitted maximum of 1.5:1 FAR within the R4-zoned portion of the Project Site; and (3) an off-menu incentive to permit for a height increase to 86 feet in lieu of the maximum height limitation of 45 feet within the R4-1VL Zone, and the transitional height limitation of LAMC Section 12.21.1 A.10 for the C2-1VL portion of the site, which is limited to 33 feet height when within 50 to 99 feet of the R1 Zone. The incentives and other requested permits and approvals are listed under the heading “Requested Permits and Approvals” below.

## **h) Sustainability Features**

The Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements, and would be equivalent to a LEED Silver rating. The Project would include, but not be limited to, the following features:

- Five (5) percent of the required and proposed parking spaces will have chargers for electric vehicles and 20 percent of the required and provided parking spaces will be pre-plumbed for future electric vehicle charging;
- Air tight and insulated envelope;
- Low-E windows;
- Low-water use plumbing fixtures;
- Energy Star appliances;
- LED lighting with motion sensors;
- MERV 13 air filters;
- Low-water use landscaping and weather-sensor controlled drip irrigation; and
- Solar thermal or photovoltaic systems.

Moreover, in accordance with CEQA Guidelines, the Project’s Environmental Impact Report (EIR) will provide further information regarding energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation.

## **i) Anticipated Construction Schedule**

The Project would be constructed over approximately 30 months. Construction activities would include the demolition of the existing building and surface parking lot and grading, excavation, and building construction. Demolition activities are anticipated to start in the

second quarter of 2022, and construction completion and occupancy is anticipated in the fourth quarter of 2024.

The Project is estimated to require the removal of approximately 96,000 square feet of asphalt and a net export of approximately 72,900 cubic yards of soil. The proposed subterranean levels would require excavation of approximately 45 vertical feet. Exported materials would likely be disposed at Chiquita Canyon Sanitary Landfill in Castaic and/or Manning Pit in Irwindale. The Project's haul route would be reviewed by the City as part of its consideration of the Project Applicant's entitlement requests.

## 4. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary and ministerial entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- (1) Pursuant to LAMC Section 12.22 A.25, a 35% Density Bonus in exchange for the provision of 11 percent Very Low Income affordable housing units with one on-menu and two off-menu incentives, as described below:
  - a. On-menu incentive for Floor Area Averaging across the C2-1VL and R4-1 Zones;
  - b. Off-menu incentive to increase the maximum allowable FAR of 3.56:1 for the entire Project Site, in lieu of the otherwise permitted maximum of 1.5:1 FAR within the R4-zoned portion of the Project Site;
  - c. Off-menu incentive for a height increase to 86 feet in lieu of the maximum height limitation of 45 feet within the R4-1VL Zone, and the transitional height limitation of LAMC Section 12.21.1 A.10 for the C2-1VL portion of the site, which is limited 33 feet height when within distance of 50-99 feet from a R1 Zone;
- (2) Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit for the sales and dispensing of alcoholic beverages for on- and off-site consumption within the proposed restaurant and retail uses;
- (3) Pursuant to LAMC Section 12.27, a Zone Variance to allow commercial parking within the R4 Zone;
- (4) Pursuant to LAMC Section 16.05, Site Plan Review for a project with 50 or more dwelling units;

- (5) Haul route approval;
- (6) Removal of street trees (if required); and
- (7) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the Project.

# Attachment B

## Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below provide an initial analysis of potential environmental impacts, indicate those issues that are expected to be further analyzed in an Environmental Impact Report (EIR), and demonstrate why other issues, which will not result in potentially significant environmental impacts, do not need to be analyzed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would, in fact, result from the Project. Rather, such responses indicate those issues will be further analyzed in an EIR to determine the impact level of significance in compliance with CEQA.

### 1. Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experiences from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. Scenic vistas are generally described in two ways: (1) panoramic views (visual access to a large geographic area, for which the field

of view can be wide and extend into the distance); and (2) focal views (visual access to a particular object, scene, or feature of interest).

The approximately 2.78-acre Project Site is currently occupied by a 37,900-square-foot commercial building and a surface parking lot. While the Project Site is relatively flat, Sepulveda Boulevard slopes up toward the south, adjacent to the eastern boundary of the Project Site. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed, nor does the Project Site contain a scenic vista. The existing viewshed at the Project Site is defined by existing urban development with commercial and residential structures. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are near the Project Site vicinity. Therefore, the Project would result less than significant impacts on scenic vistas and no mitigation measure are required. No further evaluation of this topic is required in the EIR.

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

**Less Than Significant Impact.** A significant impact would occur if scenic resources within a State scenic highway would be damaged and/or removed by development of a project.

There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.<sup>1</sup> The nearest eligible (not designated) scenic highway to the Project Site is State Route 1, also known as Pacific Coast Highway, which is eligible for scenic designation from where Lincoln Boulevard intersects Venice Boulevard north through Malibu. Lincoln Boulevard is approximately 2.8 miles west of the Project Site. Therefore, the Project would not have an impact on scenic resources or historic buildings within a State scenic highway. Accordingly, impacts would be less than significant and no mitigation is required. No further evaluation of this topic is required in the EIR.

**c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experiences from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Less Than Significant Impact.** A significant impact may occur if, in a non-urbanized

<sup>1</sup> City of Los Angeles Department of City Planning, *Mobility Plan 2035, Appendix B: Inventory of Designated Scenic Highways and Guidelines, December, 2015.*

area, the project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, the project would conflict with applicable zoning or regulations governing scenic quality.

The Project is located in a highly urbanized area in the Palms-Mar Vista-Del Rey community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would involve the demolition of the existing building and surface parking lot, and the construction of a seven-story, 86-foot tall, mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space, and three levels of subterranean parking. The proposed building would reach a height of approximately 86 feet in seven stories. Thus, the Project would result in a change in the visual character of the Project Site.

### **Zoning Consistency**

The Los Angeles Municipal Code (LAMC) establishes the zoning for the Project Site as C2-1VL (Commercial – Very Limited Height District) and R4-1 (Multiple Dwelling –Height District 1). The C2 Zone, which comprises approximately 85 percent of the Project Site, allows a range of commercial land uses, including retail, restaurants, service stations, churches, and schools. The R4 zone, which comprises the remaining approximately 15 percent of the Project Site, allows a range of residential and other land uses, including single-family and multi-family residences, churches, schools, and child care centers.

The Project's proposed building height would reach approximately 86 feet (seven above-ground stories). Existing buildings that immediately surround the Project Site range from one to 12 stories high. A 12-story office building and associated three-story parking structure neighbors the Project Site to the north. Four- to five-story multi-family residential buildings and a commercial shopping center, containing one-story buildings including a pharmacy, are located east of the Project Site across Sepulveda Boulevard. A vacant paved lot, one- and two-story single-family homes, and two-story apartment buildings are to the south of the Project Site, across Palms Boulevard. The homes across Palms Boulevard from the Project Site are located below Palms Boulevard and below the grade of the Project Site, due to the existing grade of Palms Boulevard where it overpasses the 405 freeway. The Project would introduce a building that is taller than some of the surrounding buildings and shorter than others.

The Project Site is within Very Limited Height District for the C2-zoned area and Height District 1 for the R4-zoned area. Very Limited Height District when associated with a C Zone limits height to 45 feet and three stories and FAR to 1.5:1. Height District 1 when associated with R4 does not limit height but limits FAR to 3:1.

Of the 409 dwelling units proposed, 11 percent of the base density of 303 units (34 units) would be reserved for Very Low Income households and, therefore, would qualify for a 35 percent density bonus with up to three on- or off-menu incentives as set forth in the State Density Bonus law (California Government Code Section 65915) and the City's Density Bonus Ordinance (LAMC Section 12.22 A.25). The Project requests an on-menu incentive for floor area averaging to allow an FAR of 3.56:1 across the entire Project Site, as the lot is split zoned between the R4-1 Zone, which allows 3:1 FAR, and the C2-1VL Zone, which allows 1.5:1 FAR; and two off-menu incentives to permit an FAR of 3.56:1 across the Project Site; and an overall building height of 86 feet in lieu of the maximum height limitation of 45 feet within the R4-1VL Zone, and the transitional height limitation of LAMC Section 12.21.1 A.10 for the C2-1VL portion of the site, which is limited 33 feet height when within distance of 50-99 feet from an R1 Zone. As the incentives are allowed as part of the State Density Bonus law, this is not considered a conflict with applicable zoning.

As the incentives are allowed as part of the State Density Bonus law, this is not considered a conflict with applicable zoning governing scenic quality.

### **Other Regulations Governing Scenic Quality**

The Project Site has a General Plan land use designation of Neighborhood Commercial in the Palms – Mar Vista – Del Rey Community Plan. The LAMC establishes the zoning for the Project Site as C2-1VL (Commercial – Very Limited Height District) and R4-1 (Multiple Dwelling – Height District No. 1). The Project Site is also within an Urban Agricultural Incentive Zone and the West Los Angeles Transportation Improvement and Mitigation Specific Plan area. None of these plans govern scenic quality and therefore no impact would occur.

Therefore, the Project would not conflict with applicable zoning or regulations governing scenic quality. Accordingly, impacts would be less than significant and no mitigation is required. No further evaluation of this topic is required in the EIR.

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

**Less Than Significant Impact.** A significant impact may occur if the development introduces new sources of light or glare on or from a project site which adversely affect day or nighttime views in the area.

### **Construction**

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include



floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction lighting would be to increase the overall ambient glow emanating from the Project Site. Per the requirements of the LAMC, construction hours would be limited to 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. As such, Project construction lighting would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. Therefore, impacts related to construction lighting would be less than significant.

## **Operation**

### Light

The Project is located in a well-lit area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Sepulveda Boulevard is a major thoroughfare with four lanes of traffic plus a turning lane and two parking lanes. Palms Boulevard is a major thoroughfare with four lanes of traffic plus a turning lane. There are also billboards and retail signage along Sepulveda and Palms Boulevards. The residential uses in the area generally do not produce much ambient lighting beside outdoor security and wayfinding lighting. The commercial shopping centers at the northeast and southeast corners of the intersection of Sepulveda Boulevard and Palms Boulevard include parking lot lighting and commercial establishment security and signage lighting. The streets in these areas are lit using city standard street lights which are generally widely spaced and focus primarily on intersections.

The I-405 Freeway runs north/south near the western boundary of the Project Site. The Project Site is slightly elevated adjacent to the freeway, with a wall between the freeway and the Project Site, resulting in an obstructed view of the Project Site for motorists on the freeway. The freeway naturally features higher ambient light levels from headlights and roadway lighting.

Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, thus, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As land uses surrounding the Project Site are already lit from existing development in the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would increase lighting effects compared to the existing uses, which are currently visible from the surrounding uses. There are several sensitive use receptors

near the Project Site that could be susceptible to light impacts created by the Project. Sensitive uses are defined by Los Angeles Municipal Code Chapter IX, Article 3, Section 93.0117 as any exterior glazed window or sliding glass door on any other property containing a residential unit or units, elevated habitable porch, deck, or balcony on any other property containing a residential unit or units, or any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units. Office, warehouse, manufacturing, commercial, and institutional uses are not considered light sensitive uses because they are generally not in use during the evening hours, although many of these uses maintain interior, exterior, and/or landscape lighting during the late hours for maintenance and security purposes.

The light-sensitive uses in the vicinity include the four- and five-story multi-family residential buildings located east of the Project Site across Sepulveda Boulevard and the one- and two-story single-family homes and two-story apartment buildings to the south of the Project Site, across Palms Boulevard.

Night lighting for the Project would be provided to illuminate building entrances, driveways, commercial use, and for security. Additionally, the Project proposes to use the interior unit corridor and entry locations to illuminate the function of entry points for the units along the corridor. Each portion of unit entry will have accent colors with downlights to create a fixed illumination onto the residential unit walls during the night time. Therefore, the western façade of the Project facing the I-405 freeway would have transparent glass walls with fixed internal illuminating corridor along the residential corridor and residential entry wall. The ground level wall facing the I-405 freeway would have fixed accent up-lighting behind the landscape to illuminate the landscape and fixed accent illumination to the exterior wall facing the I-405 freeway. As the proposed lighting effects would be on the western side of the Project next to the I-405 freeway and would not face residential uses, the lighting feature would not impact light-sensitive receptors.

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. However, the Project would comply with LAMC Section 12.21 A.5(k) (Design of Parking Facilities – Lighting), which requires parking area lighting to reflect away from any street and any adjacent premises; LAMC Section 14.4.4 E (Sign Illumination Limitations), which prohibits sign lighting from producing a light intensity of greater than three foot candles above ambient lighting as measured from the nearest residentially zoned property; and LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot candles, or from receiving direct glare from the light source.<sup>2</sup>

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<sup>2</sup> *Direct glare, as used in LAMC Section 93.0117, is a glare resulting from high luminances or insufficiently shielded light sources that is in the field of view.*

Interior and exterior lights on the Project Site would not shine directly onto the above identified light-sensitive uses, and would not result in light trespass. The perception of this lighting sources would be similar to that already provided by the surrounding buildings. Although additional lighting sources associated with the Project could add to the ambient glow of the Project Site and immediately surrounding uses, the areas on Sepulveda and Palms Boulevard are already characterized by moderate to high ambient light levels consistent with an urban area. While residential areas to the south, across Palms Boulevard, are characterized by lower than average ambient light levels for an urban area, none of the lighting sources associated with normal project operations would generate light intensity levels of 2.0 foot candles or more at any residential property line outside of the Project Site, per LAMC requirements, nor would they represent a substantial change in the lighting environment of the Project Site and surrounding area. As such, Project lighting would not result in substantial changes to existing artificial light conditions, and would not interfere with off-site activities. Therefore, impacts related to Project interior and exterior light sources would be less than significant at these locations.

### Glare

The Project would incorporate both solid and glass surfaces. The proposed Project building would be prohibited from the using highly reflective building materials such as mirrored glass on exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future. The Project would be required to comply with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor areas of residential units from being illuminated by more than two foot candles, or from receiving direct glare from the light source. As such, the Project would not include elements that incorporate substantial amounts of reflective building materials in areas that are highly visible to off-site glare-sensitive uses. Exterior building materials would use various non-reflective material designed to minimize the transmission of glare from building. Therefore, Project impacts related to daytime glare would be less than significant.

## 2. Agriculture and Forest Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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 or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**No Impact.** A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The Project Site is developed with a commercial building and surface parking lot, and is located in a developed area of the City. According to the State Farmland Mapping and Monitoring Program’s most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>3</sup> Thus, Project implementation would not result in the loss of State-designated Farmland. Therefore, no

<sup>3</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed: June 13, 2018.

impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** A significant impact may occur if a project were to conflict with land zoned for agricultural use or under a Williamson Act contract. The Project Site is zoned C2-1VL (Commercial – Very Limited Height District) and R4-1 (Multiple Dwelling – Height District No. 1). Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State’s most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract.<sup>4</sup> Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** A significant impact may occur if a project were to result in a conflict with land zoned for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned timberland production (as defined by Government Code section 51104(g)). There are no forest or timberland resources on this fully developed site that is in an urbanized part of the City.

In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned C2-1VL (Commercial – Very Limited Height District) and R4-1 (Multiple Dwelling –Height District No. 1). The Project Site is not zoned for forest land, timberland, or timberland production land uses. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>4</sup> State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act FY 2015/2016, published 2016, website: [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf), accessed: June 13, 2018.

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

**No Impact.** A significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use. The Project Site is entirely developed with a commercial building and surface parking lot, and is located in a developed area of the City. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant impact may occur if a project indirectly results in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The Project Site is previously developed and located in an urbanized area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### 3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** A significant air quality 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 City, including the Project Site, is within the South Coast Air Basin (Basin), and the South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. The SCAQMD has responded to this requirement by preparing a series of AQMPs. The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in previous AQMPs have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. However, as construction and operation of the Project could result in an increase in emissions, potential impacts may be significant. Therefore, this topic will be further evaluated in an EIR.

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

**Potentially Significant Impact.** A significant impact may occur if a project would add a cumulatively considerable contribution to federal or State non-attainment pollutants. The Basin, wherein the Project Site is located, is currently in non-attainment for ozone, lead, and particulate matter (PM). However, as the construction and operation of a new intensity of development from the Project could emit criteria air pollutants that could result in a cumulatively considerable net increase of ozone, lead and/or particulate matter, potential impacts may be significant. Therefore, this topic will be further evaluated in an EIR.

- c) Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site cause localized pollutant levels to exceed state ambient air quality standards at sensitive receptors or where a project causes an increase in local contaminants during construction and operation. A significant impact may also occur where a project would cause concentrations at sensitive receptors located near congested intersections to exceed the national or State ambient air quality standards and the traffic generated by the project contributes to the concentrations.

Sensitive receptors near the Project Site include, but are not limited to, the existing residences across Sepulveda Boulevard to the east and south, and Charnock Road Elementary School to the south. Additional sensitive receptors may also be identified during the preparation of the EIR. As the construction and operation of the Project could emit substantial concentrations of air pollutants near those sensitive receptors, such as the residences to the east across Sepulveda Boulevard, potential impacts may be significant. Therefore, this top will be further evaluated in an EIR.

- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less Than Significant Impact.** A significant adverse effect could occur if construction or operation of a project would create emissions affecting a substantial number of people.



Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of a mixed-use project with a commercial and residential uses, which are not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation is required. No further evaluation of this topic in an EIR is required.

## 4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less Than Significant Impact.** The Project Site is developed with a commercial building and surface parking lot in a developed area of the City. The Project Site and immediately

surrounding area are not within or near a designated Significant Ecological Area.<sup>5</sup> The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is developed with a commercial building and surface parking lot in an urbanized area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.<sup>6</sup> As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** A significant impact would occur if state federally protected wetlands are modified or removed without adequate mitigation. The Project Site is developed with a commercial building and surface parking lot in an urbanized area of the City. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site,<sup>7</sup> nor does the State of California Wetlands identify any wetlands in the vicinity of the Project Site.<sup>8</sup> Furthermore, the Project Site does not support any riparian or wetland

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<sup>5</sup> Los Angeles County Department of Regional Planning, *Planning & Zoning Information, GIS-NET3 online database*, website: <http://planning.lacounty.gov/gisnet3>, accessed: June 13, 2018.

<sup>6</sup> U.S. Fish and Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed: June 13, 2018.

<sup>7</sup> U.S. Fish and Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed: June 13, 2018.

<sup>8</sup> California Wetlands Portal, available at: [https://www.mywaterquality.ca.gov/eco\\_health/wetlands/](https://www.mywaterquality.ca.gov/eco_health/wetlands/), accessed January 29, 2019.

habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** There are no wildlife corridors or native wildlife nursery sites in the Project vicinity. A *Tree Evaluation Report* (dated January 12, 2016 and updated April 16, 2018, included as Appendix A to this Initial Study) identified eight queen palms (*Syagrus romanzoffiana*) on the eastern corner of the Project Site along Palms Boulevard.<sup>9</sup> The existing trees would be removed during construction. There are no street trees on or adjacent to the Project Site. The queen palms (*Syagrus romanzoffiana*) tree species is not protected by the City's Tree Protection Ordinance; however, the existing trees may provide temporary suitable habitat for nesting migratory birds, which are protected under the Federal Migratory Bird Treaty Act (MBTA). The MBTA, which is an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Section 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). Tree removals would be undertaken pursuant to applicable City permits and requirements. The Project would be required to comply with these existing Federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Additionally, the Project would provide 103 new trees within the common open space areas and all street trees to be removed would be replaced per LAMC and Urban Forestry requirements as part of the Project's landscape plan. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact.** A significant impact could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species,

<sup>9</sup> *BonTerra Psomas, Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, January 12, 2016; and Psomas, Update to the Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, April 16, 2018.*

which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

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

A certified arborist inspected the Project Site on January 5, 2016 and on April 13, 2018 (see Appendix A to this Initial Study) to determine if any native protected species are present on the Project Site as set forth in Ordinance No. 177,404.<sup>10</sup> The arborist conducted a walk-through of the Project Site. The only trees on the Project Site are eight queen palms (*Syagrus romanzoffiana*) on the eastern corner of the Project Site, along Palms Boulevard.<sup>11</sup> There are no street trees on or adjacent to the Project Site. The existing queen palms (*Syagrus romanzoffiana*) would be removed during construction. These tree species are not protected by the City's Protected Tree Ordinance. Therefore, construction of the Project would not affect any protected trees. Moreover, the Project would provide 103 trees within the common open space areas and would replace all street trees to be removed would be replaced per LAMC and Urban Forestry requirements as part of the Project's landscape plan. Types of trees and planting locations would be reviewed and approved by the Bureau of Street Services' Urban Forestry Division. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** A significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community

<sup>10</sup> BonTerra Psomas, *Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, January 12, 2016*; and Psomas, *Update to the Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, April 16, 2018*.

<sup>11</sup> BonTerra Psomas, *Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, January 12, 2016*; and Psomas, *Update to the Tree Evaluation Report for the 3443 South Sepulveda Boulevard Project Site, City of Los Angeles, California, April 16, 2018*.



Conservation Plan, or other approved local, regional, or State habitat conservation plan.<sup>12</sup> Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>12</sup> *California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, website: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: June 13, 2018.*

## 5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

**Less Than Significant Impact.** Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology. The Project Site is currently developed with a commercial building and a surface parking lot. The existing single-story building contains approximately 37,900 square feet of floor area. Currently, the commercial building is operating as a college student art studio associated with University of California, Los Angeles; the building was previously operating as a supermarket.

The property is not currently listed under national, state, or local landmark or historic district programs. It was also not identified in any historic resources surveys of the area, including SurveyLA, the citywide historic resources survey of Los Angeles, and a records

search prepared by the South Central Coastal Information Center (SCCIC) did not yield any prior evaluations of the property.<sup>13</sup> The SCCIC records search revealed that the property was located within the study area for the Exposition Corridor Transit Project Phase 2; however, it does not appear to have been recorded or identified as historic as a result of these efforts. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS), the building was built in 1957.<sup>14</sup> According to ZIMAS and the Los Angeles Historic Resources Inventory, neither the Project Site nor the building on-site is identified on any historic resource lists or databases.<sup>15,16</sup> The Palms – Mar Vista – Del Rey Community Plan Area was surveyed by SurveyLA, which did not identify any potential historic resources on the Project Site.<sup>17</sup> However, the building is eligible for consideration as a historic resource because it is over 50 years of age. Therefore, a historic resource evaluation was conducted to determine whether or not the existing building is a historic resource.

Appendix B to this Initial Study contains the *3443 S. Sepulveda Boulevard Historical Resource Evaluation Report* (the “Historic Resource Report”) prepared by GPA Consulting. The following discussion summarizes the evaluation in the Historic Resource Report.

In preparing the Historic Resource Report, GPA performed the following tasks:

1. Requested a records search from the SCCIC to determine whether or not the subject property is currently listed under national, state, or local landmark or historic district programs and whether or not it has been previously identified or evaluated as a potential historical resource. This involved a review of the California Historic Resources Inventory System (CHRIS), which includes data on properties listed and determined eligible for listing in the National Register of Historic Places, listed and determined eligible for listing in the California Register of Historical Resources, California Registered Historical Landmarks, Points of Historical Interest, as well as properties that have been evaluated in historic resources surveys and other planning activities.

Per the records search results prepared by SCCIC June 20, 2018, there were no prior evaluations of the property. The records search revealed that the property

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<sup>13</sup> GPA Consulting , *3443 S. Sepulveda Boulevard Historical Resource Evaluation Report*, June 2018.

<sup>14</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>15</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>16</sup> City of Los Angeles, Office of Historic Resources, *Los Angeles Historic Resources Inventory*, website: <http://www.historicplacesla.org/map>, accessed: June 13, 2018.

<sup>17</sup> Historic Resources Group, *SurveyLA Los Angeles Historic Resources Survey, Historic Resources Survey Report, Palms–Mar Vista–Del Rey Community Plan Area*, July 2012.

was located within the study area for the Exposition Corridor Transit Project Phase 2; however, it does not appear to have been recorded or identified as historic as a result of these efforts.

2. Researched the property to determine whether or not it was identified as significant through SurveyLA, the citywide historic resources survey. This research revealed that it was not identified as a potential historical resource as part of SurveyLA. Conducted a field inspection of the property to ascertain the general condition and physical integrity of the building thereon. Digital photographs were taken during this field inspection, which included the interior and exterior of the building.
3. It was concluded during the field inspection and through additional research that there were not enough properties in the surrounding area from the same period of time or with the same physical qualities and historical associations to form a potential historic district. Therefore, the property was evaluated as an individual potential historical resource under national, state, and local criteria according to National Park Service, State Office of Historic Preservation, and Los Angeles Office of Historic Resources standards.
4. Conducted research into the history of the property. Sources referenced included building permit records, city directories, prior survey data, newspaper archives, and historic maps.
5. Consulted the Context/Theme/Property Type (CTP) eligibility standards formulated for the *Los Angeles Citywide Historic Context Statement* to identify the appropriate CTPs under which to evaluate the property.
6. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation designations, and assessment processes and programs to evaluate the significance and integrity of the property as a potential historical resource.

## Regulatory Framework

Generally, a lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register of Historical Resources (California Register). The California Register is modeled after the National Register of Historic Places (National Register). Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or

culturally significant.<sup>18</sup> The National Register, California Register, and local designation programs are discussed below.

## National Register of Historic Places

The National Register is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”<sup>19</sup>

### Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:<sup>20</sup>

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

### Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”<sup>21</sup> A property must represent an

<sup>18</sup> *Public Resources Code Section 5024.1 and 14 California Code of Regulations Sections 4850 & 15064.5(a)(2).*

<sup>19</sup> *Title 36 Code of Federal Regulations Part 60.2.*

<sup>20</sup> *Title 36 Code of Federal Regulations Part 60.4.*

<sup>21</sup> “*National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*,” *National Park Service, Cultural Resources*, eds. Patrick Andrus and Rebecca Shrimpton, accessed June 2018, <https://www.nps.gov/nr/publications/bulletins/nrb15/>.

important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

## Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."<sup>22</sup> Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
- It independently meets the criterion for listing in the National Register.<sup>23</sup>

## California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.<sup>24</sup>

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and

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<sup>22</sup> *National Register Bulletin #15, 44-45.*

<sup>23</sup> "National Register Bulletin 16: How to Complete the National Register Registration Form." *National Park Service, Cultural Resources, Linda McClelland, Carol D. Shull, James Charleton, et al., accessed June 2018, <https://www.nps.gov/nr/publications/bulletins/nrb16a/>.*

<sup>24</sup> *Public Resources Code Section 5024.1 (a).*



- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.<sup>25</sup>

## Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.<sup>26</sup>

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:<sup>27</sup>

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [SOHP] procedures and requirements;

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<sup>25</sup> *Public Resources Code Section 5024.1 (d).*

<sup>26</sup> *Public Resources Code Section 4852.*

<sup>27</sup> *Public Resources Code Section 5024.1.*

3. The resource is evaluated and determined by the office [SOHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

## SOHP Survey Methodology

The evaluation instructions and classification system prescribed by the SOHP in its *Instructions for Recording Historical Resources* provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this report are as follows:

- 6Z Found ineligible for National Register, California Register, or local designation through survey evaluation.

## Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance<sup>28</sup> in 1962 and amended it in 2018 (Ordinance No. 185472). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The three criteria for HCM designation are stated below:

1. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state or community; or
2. The proposed HCM is associated with the lives of historic personages important to national, state or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

## Environmental Setting

### Brief History of Palms<sup>29</sup>

Palms is a community located west of Downtown Los Angeles, east of Santa Monica, and northwest of Culver City. Palms was a predominantly agricultural community in the late 1800s. By 1915, Palms was consolidated to the City of Los Angeles. During the 20<sup>th</sup> Century, the Palms area saw expansion of businesses and population consistent with the larger Southern California Region, including the expansion of the aerospace industry and westward residential development in place of the previous agrarian character.

### Description and History of the Project Site

The building on the Project site is constructed near the center of the large parcel, and is surrounded by an asphalt surface parking lot. The building is one story in height and

<sup>28</sup> *Los Angeles Administrative Code Section 22.171 of Article 1, Chapter 9, Division 22.*

<sup>29</sup> *Excerpted from: Historic Resources Group, "Historic Resources Survey Report: Palms-Mar Vista-Del Rey Community Plan Area," SurveyLA Los Angeles Historic Resources Survey (Office of Historic Resources, July 2012), 3-7.*

rectangular in plan with a bow-truss roof and raised parapet. The exterior of the building is clad in stucco and split-face concrete block. On the customer entrance elevations (northeast and northwest) the building has stucco belt courses and pilasters that break up the simple geometric volume of the building. On the rear elevations (southeast and southwest), the building is simply clad in stucco.

The building has two customer entrances. The larger of the two faces northeast towards S. Sepulveda Boulevard, and the smaller of the two faces northwest towards an adjacent property. Above these entrances is a projecting canopy with a stepped and rounded parapet with room for signage. The northeast entrance consists of a pair of metal-framed glass automatic sliding doors with transoms and sidelights. To the left (east) of the northeast entrance, there is a hollow metal door. The northwest entrance consists of a pair of metal-framed glass automatic sliding doors with a transom. To the right (south) of the northwest entrance is a pair of hollow metal doors. There are no window openings on these elevations.

The southeast elevation of the building faces Palms Boulevard. At the south end of the elevation, there is a loading dock and ramp. At the north end of the elevation, there is a rectangular projection that appears to contain utility equipment. There is a pair of hollow metal doors on its southeast elevation, and a switchgear enclosure on its northeast elevation. There are no window openings on this elevation.

The southwest elevation faces I-405. On this elevation, there is a dust collector and two concrete ramps, one of which leads to a pair of hollow metal doors, while the other leads to the loading dock on the southeast elevation. There are no window openings on this elevation.

The interior of the building consists of contemporary finishes. The floors are poured concrete and the ceilings are acoustical tile with fluorescent and track lighting. There are remnants of the building's previous supermarket use, including tiled areas for seafood, meat, and deli counters, and cold storage freezers. The majority of the space has been partitioned for the UCLA Department of Art Graduate Studios with metal stud framing and drywall.

## Building History

The building at 3443 S. Sepulveda Boulevard was completed in 1957 per Los Angeles County Tax Assessor data. The owner of the property listed on the original permit is California Community Homes. "California Community Homes" was not found in city directories or newspaper archives; however, the entity was found in a 1947 *Official Directory of Licensed Contractors* published by the California Contractors' State License

Board.<sup>30</sup> Under the listing, F.B. Burns is listed as President and H.J. Kaiser, Jr. as the Vice President. These men, Fritz B. Burns and Henry J. Kaiser, Jr., were the leaders of Kaiser Community Homes, a community building partnership that began in 1945.<sup>31</sup> Research did not indicate why the enterprise was listed as California Community Homes rather than Kaiser Community Homes (KCH) in these instances.

Burns, a real estate developer and subdivider, had a prior partnership with a man named Fred W. Marlow. The two formed Marlow-Burns and Company Realtors, Owners, and Developers. The company improved and sold lots in several tracts throughout the Los Angeles area, including Windsor Hills, Westchester, Toluca Wood, and Westside Village. Westside Village is located in the Palms/Mar Vista area, very near the subject property. It was bounded by Overland Avenue to the east and National Boulevard to the north (see Figure 20 of the Historic Resource Report, included as Appendix B to this Initial Study).<sup>32</sup>

Westside Village was strategically placed near Douglas Aircraft's new parent facility in Santa Monica, and offered a variety of home styles "to avoid monotony." The basic house type utilized by Marlow-Burns at Westside Village became a prototype for KCH's postwar suburban developments.<sup>33</sup> After World War II, Burns partnered with Kaiser to form KCH, and went on to design and develop the planned community of Panorama City in the San Fernando Valley.

By 1952, taxes compelled KCH to pursue additional commercial retail and office development. The profits from their home sales exceeded their excess profits tax exemption, and additional income was being taxed at a rate of 70 percent. In their situation, it was more desirable to use available working capital to develop income-producing commercial properties.<sup>34</sup> It is ostensibly for this reason that KCH developed the retail store near Westside Village.

Research indicates that the first tenant was "MORE, Inc.," a membership discount department store. By 1960, there were four locations in the greater Los Angeles area, including the subject property. There was another in Reseda (18300 Vanowen Street), one in South San Gabriel (8682 Garvey Boulevard), and a fourth in Paramount (16400 S.

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<sup>30</sup> *California Contractors' State License Board, Official Directory: Licensed Contractors of California (Registrar of Contractors, Department of Professional and Vocational Standards, 1947)*, 198, accessed June 2018, <https://books.google.com/books?id=QGIZAQAIAAJ>.

<sup>31</sup> Greg Hise, *Magnetic Los Angeles: Planning the Twentieth Century Metropolis* (Baltimore: Johns Hopkins University Press, 1997), 248.

<sup>32</sup> Greg Hise, *Magnetic Los Angeles: Planning the Twentieth Century Metropolis* (Baltimore: Johns Hopkins University Press, 1997), 134-148.

<sup>33</sup> Greg Hise, *Magnetic Los Angeles: Planning the Twentieth Century Metropolis* (Baltimore: Johns Hopkins University Press, 1997), 137-140.

<sup>34</sup> Greg Hise, *Magnetic Los Angeles: Planning the Twentieth Century Metropolis* (Baltimore: Johns Hopkins University Press, 1997), 206.

Garfield Avenue). Per a display ad published in the *Los Angeles Times* in 1960, store offered discount memberships to the following individuals:

1. Employees of any individual firm producing for the government
2. Employees of any branch of Municipal, County, State or Federal government, active or retired
3. Members and veterans of the military or military reserve
4. Employees of public utilities
5. Employees of non-profit, eleemosynary or religious institutions<sup>35</sup>

The building was occupied by MORE, Inc., until at least 1963.<sup>36</sup> An ad that ran in 1965<sup>37</sup> indicates that the building was briefly occupied by a business known as “Fantastic Fair,” before a department store chain known as Leonard’s arranged to lease the building at 3443 S. Sepulveda Boulevard from the owner, the Los Angeles Cemetery Association, in 1967. The Cemetery Association presumably owned the building as an investment income-producing property for upkeep of cemeteries. At the time, Leonard’s Department store announced plans to entirely remodel the interior and exterior of the building.<sup>38</sup>

Research indicates that this store is likely a later branch of the Leonard Brothers, or Leonard’s, department store that originated in downtown Fort Worth, Texas. It was founded by two brothers, John and Obadiah Leonard, in 1918. The business initially sold salvaged goods and groceries, and eventually expanded their offerings to meat, produce, drugs, dry goods, hardware, auto supplies, and seeds. The company stayed open during the Great Depression by offering check-cashing services and selling necessities, like bread, at steeply discounted prices. The store chain continued to cash checks even when all the banks were closed by offering customers “Leonard’s Script,” a cash equivalent that was redeemable at their stores.<sup>39</sup>

By 1939, Leonard’s added furniture, appliances, and farm equipment to their product lines. The store flourished during the postwar years as the brothers continued to add more products and expanded the stores with new buildings, employees, and offerings. By the 1960s, the store had grown to over 2,000 employees working in 185 different

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<sup>35</sup> *Los Angeles Times*, November 13, 1960, SF6.

<sup>36</sup> *Los Angeles Times*, August 23, 1963, 22.

<sup>37</sup> *Los Angeles Times*, January 25, 1965, 17.

<sup>38</sup> “Store Leased by Leonard’s,” *Los Angeles Times*, April 2, 1967, N2.

<sup>39</sup> “Leonard Brothers,” Walter Beunger, *Texas State Historical Association*, accessed June 2018, <https://tshaonline.org/handbook/online/articles/dhllef>.



departments, and even had a proprietary subway that transported customers from a nearby parking lot.<sup>40</sup>

In 1965, John Leonard's failing health prompted him to sell his majority share in the business to his brother, Obadiah. In 1967, Obadiah Leonard sold the store to the Tandy Corporation for over \$8 million. Following the sale to the business conglomerate Tandy Corp, more Leonard's department stores opened in suburban areas. Tandy Corp. was owned by Texas-based businessman Charles David Tandy.<sup>41</sup> In the 1970s, the conglomerate also included Radio Shack, Wolfe nurseries, and Color Tile stores, most of which are now defunct.<sup>42</sup> By 1974 the store was losing profitability under a new business model. Tandy Corporation sold Leonard Brothers to Dillard's, and the Leonard's name was removed from stores.<sup>43</sup>

As such, the subject building was occupied by Leonard's department store until 1974. By 1975 until at least 1977, it was occupied by Fazio's. Fazio's was a Cleveland-based grocery store chain.<sup>44</sup> By 1981 until as late as 1987, an establishment known as "Grocery Warehouse" occupied the building.

## Alterations

The building was completed in 1957. Since that time, it has been extensively altered, as shown by the building permit record (see Appendix B to the Historic Report for a table summarizing building permits for the property, which is Appendix B to this Initial Study). For all intents and purposes, it appears to be a contemporary building. Because of these alterations it is impossible to discern how the building might have looked historically. Alterations include a number of interior alterations and roof repairs as well as an extensive remodel of the entire building in 2008. Historic aerial imagery indicates that the northwest portion of the building was demolished between 1972 and 1980.

## Evaluation of Eligibility

### Historic Contexts

The significance of a property must be evaluated within its historic context(s). Historic contexts are those patterns or trends in history by which a specific property is understood. The contexts, themes, and sub-themes discussed below were drawn from the *Los*

<sup>40</sup> *Los Angeles Times*, November 13, 1960, SF6.

<sup>41</sup> *Los Angeles Times*, November 13, 1960, SF6.

<sup>42</sup> "Charles Tandy Dies; Headed Firm that Owns Radio Shack," *Los Angeles Times*, November 5, 1978, A4.

<sup>43</sup> Beunger, Walter. "Leonard Brothers." *Texas State Historical Association*. Accessed June 2018. <https://tshaonline.org/handbook/online/articles/dhlef>.

<sup>44</sup> "First National Supermarkets, Inc.," *Case Western Reserve University Encyclopedia of Cleveland History*, accessed June 2018, <https://case.edu/ech/articles/f/first-national-supermarkets-inc-finast>.

*Angeles Citywide Historic Context Statement* and are relevant in judging the significance of the subject property. The relevant context and theme for the property was Commercial Development, 1859-1980. Two specific sub-themes were identified under this context and theme: Variety Stores, 1920-1960 and Department Stores, 1920-1980. The property did not become a supermarket until 1975, and the established period of significance for supermarkets ends in 1975. The property was therefore not considered under the Market subtheme.

### **Variety Stores, 1920-1960<sup>45</sup>**

The term “variety store” is used to describe a specific type of retail store that sold a range of household items at discounted prices, such as sewing supplies, toys, stationery, toiletries, dried food, and seasonal items. They were colloquially called dime stores or five and dime stores, in reference to the low costs. Merchandise was arranged on tables or counters so customers could interact with the goods before purchasing them. Some stores also had lunch counters or a soda fountain.

These stores were typically part of chains, and the ability to charge low prices came from purchasing merchandise in bulk for sale. The earliest examples were limited to central business districts; the first store of this kind was opened by F.W. Woolworth on the east coast in 1879, followed by stores opened by J.J. Newberry, W.T. Grand, S.G. Kress, and S.S. Kresge. By 1912, Woolworth’s were open in Downtown Los Angeles, and other variety stores would follow suit.

During the 1920s, variety stores began to open stores in established neighborhood commercial districts outside the downtown area such as Hollywood, Boyle Heights, and San Pedro. These branch stores typically consisted of one or more rented storefronts. The different chains adopted the Woolworth’s signage, which consisted of serif lettering on a red background.

Variety stores continued to do well during the 1930s. The low prices attracted a wider range of customers, and stores began selling additional items such as inexpensive clothing. The relative prosperity allowed variety store chain owners to open more branch stores, some of which were purpose-built. Around 1935, the stores began to increase in size and were occasionally purpose-built along commercial corridors. The number of variety stores in the Los Angeles area had more than doubled by the 1940s.

After World War II, variety stores had evolved into a large, single-story property type. By the mid-1950s, variety stores were constructed alongside supermarkets and drug stores in postwar shopping centers. This iteration of the variety store became redundant, as the

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<sup>45</sup> *The following is excerpted from Daniel Prosser, “Commercial Development, 1859-1980: Neighborhood Commercial Development, 1880-1980,” Los Angeles Citywide Historic Context Statement (City of Los Angeles Office of Historic Resources, August 2017).*

supermarket and drug stores offered many of the same products, and lunch counters were unable to compete with the growing popularity of fast food restaurants.

As a result, the neighborhood variety store began to evolve into the “large-scale suburban discount outlet.” In the early 1960s, the S.S. Kresge Co. introduced K-mart and Woolworth’s followed suit with Woolco. Eventually, establishments like Target and Wal-Mart would become the contemporary equivalent to the early five and dime.

The eligibility standards and integrity considerations for Variety Stores, 1920-1960 are listed in Table 1 of the Historic Resource Report (see Appendix B to this Initial Study). A narrative sub-theme for department stores has not been developed for the *Los Angeles Historic Context Statement*. However, the eligibility standards and integrity considerations for department stores are listed in Table 2 of the Historic Resource Report (see Appendix B to this Initial Study).

## National Register of Historic Places

### Criterion A

To be eligible for listing in the National Register under Criterion A, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. The context considered under this criterion is Commercial Development, within the theme/sub-theme of Variety Stores and Department Stores. The property does not appear to be eligible for listing in the National Register under Criterion A for the reasons discussed below.

The building was constructed as a membership discount variety store known as MORE, Inc. in 1957. The building was occupied by MORE, Inc. until at least 1963. Research did not reveal any additional information about MORE, Inc. apart from a series of advertisements. These advertisements generally consist of a listing of MORE, Inc. as a retailer for electronic equipment such as Packard Bell color televisions. The building was then briefly occupied by a business called Fantastic Fair before the building was leased to Leonard’s department store.

The property does not meet the eligibility standards outlined in the Historic Resource Report (see Table 1 of the report, included as Appendix B to this Initial Study). While there were at least four locations by 1961, research did not reveal any evidence to suggest that MORE, Inc was a significant regional or national variety store chain, especially as compared to other variety store chains such as F.W. Woolworth or S.G. Kress. Secondly, the store was constructed in 1957. This is near the end of the period of significance for this property type (1960), which ends as the property type became less distinctive. Furthermore, any character-defining features or architectural character that would classify the subject building as a variety store have been lost to a number of alterations throughout

the years. The building presently appears contemporary as a result of these alterations. Therefore, the property is not significant under Criterion A within the context of Variety Stores.

A similar argument can be made under the context of Department Stores. The property does not meet the eligibility standards outlined in the Historic Resource Report (see Table 2 of the report, included as Appendix B to this Initial Study). Leonard's leased the building beginning in 1967 until 1974. Leonard's is not an early or major department store in Los Angeles. The store was based in Texas and had just one Fort Worth location until the business was purchased by the Tandy Corporation in 1967. The earliest department stores in Los Angeles first opened Downtown around the turn of the century before expanding west along major boulevards in the city. The subject property was not purpose-built as a department store and does not appear to have been part of any important development trend within the context. Furthermore, the extensive alterations to the building have removed any character-defining features that might have remained from the period of significance. Therefore, the property is not significant under Criterion A within the context of Department Stores.

The building does not retain sufficient physical integrity to convey any historic association with Kaiser Community Homes or postwar development trends. See the integrity discussion below. During SurveyLA, the Westside Village subdivision that could be associated with the subject property was determined to be too altered to qualify as a historic district.<sup>46</sup> Therefore, the property does not appear to be significant under Criterion A.

## Criterion B

To be eligible for listing in the National Register under Criterion B, a property must be associated with the lives of persons significant in our past. Many individuals were likely affiliated with the social businesses that occupied the building between 1958 and 2018. There were no specific individuals identified during research, as detailed in the Historic Resource Report, who would have made individually important contributions to history. While many individuals have worked for the variety of businesses since the building was initially constructed, collaborative efforts like these are typically best evaluated under Criterion A.<sup>47</sup>

The building does not retain sufficient physical integrity to convey any potential association with Fritz B. Burns or Henry J. Kaiser of Kaiser Community Homes. See the

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<sup>46</sup> Historic Resources Group. "Historic Resources Survey Report: Palms-Mar Vista-Del Rey Community Plan Area." SurveyLA Los Angeles Historic Resources Survey. Office of Historic Resources, July 2012.

<sup>47</sup> "National Register Bulletin 32: Guidelines for Properties Associated with Significant Persons," National Park Service, Cultural Resources, Beth Grosvenor Boland, website: <https://www.nps.gov/nr/publications/bulletins/nrb32/>, accessed: June 2018.

integrity discussion below. For these reasons, the property does not appear to be associated with the lives of significant individuals and does not appear to be significant under Criterion B.

### **Criterion C**

To be eligible for listing under Criterion C, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction.

The building has been so altered that the date of construction is only evident from tax assessor information and building permit records. It no longer possesses the distinguishing characteristics of any particular type, method, or period of construction. For all intents and purposes, the building appears contemporary. There was no architect listed on the original permit, and there is no reason to believe that the “Jackson Brothers” contractor would be considered a master. Research revealed no information regarding the “Jackson Brothers” company other than the fact that it operated as early as 1934. No information was found linking the company to any major landmarks or any advances in construction practices. Even if the building were designed or constructed by someone who would now be considered a master in their respective field, any physical features that would have reflected design intent or craftsmanship have since been removed.

High artistic value typically refers to “an aesthetic ideal,” such as stained glass or sculpture. The building inherently does not possess high artistic value as it has been so heavily altered. The last aspect of Criterion C, representing a significant and distinguishable entity whose components lack individual distinction, refers to historic districts. The property was evaluated individually as the surrounding area lacks the architectural and historical cohesion necessary to constitute a historic district. During SurveyLA, the Westside Village subdivision that could be associated with the property was determined to be too altered to qualify as a historic district.

For these reasons, the property does not appear to be significant under Criterion C.

### **Criterion D**

To be eligible for listing under Criterion D, a property’s physical material must have yielded, or may be likely to yield, information important to history or prehistory.

This criterion generally applies to archaeological resources, but may apply to a built resource in instances where a resource may contain important information about such topics as construction techniques or human activity. In any case, the resource must be

the principal source of information. This is unlikely to be true for the property. Therefore, it does not appear to be significant under Criterion D.

## Integrity

To be eligible for listing in the National Register, properties must retain their physical integrity from the period in which they gained significance. In the case of architecturally significant properties, the period of significance is normally the date of construction. For historically significant properties, the period of significance is usually measured by the length of the associations. As the subject property is not significant under any of the National Register criteria, it has no period of significance. Nevertheless, the property was analyzed against the seven aspects of integrity as described in *National Register Bulletin #15*: location, design, setting, materials, workmanship, feeling, and association. While some factors of integrity are more important than others depending on the property, a majority of the seven recognized factors should be retained. The subject property has been altered over time, which has diminished its physical integrity. Following is a point-by-point analysis:

- *Location – The place where the historic property was constructed or the place where the historic event occurred.*

The building has not been moved from where it was constructed. Therefore, it retains integrity of location.

- *Design – The combination of elements that create the form, plan, space, structure, and style of a property.*

The building's integrity of design is no longer intact. As a result of extensive alterations, it is impossible to discern how the building would have existed historically apart from the overall massing, as for all intents and purposes, it appears to be a contemporary building.

- *Setting – The physical environment of the historic property.*

The integrity of setting is somewhat intact. The immediate setting of the property has changed due to continued development in the area. While the property is still surrounded primarily by commercial buildings and multi-family residential buildings from the 1950s onward, many of the commercial properties at the intersection of Palms and Sepulveda have been redeveloped or remodeled so as to appear contemporary, diminishing the integrity of setting.

- *Materials – The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.*

The integrity of materials is no longer intact as a result of extensive alterations, as shown in the building permit summary within the Historic Resource Report (see page 31 of the Historic Report, which is Appendix B to this Initial Study). There do not appear to be any remaining materials dating from the date of construction, and it is impossible to discern what materials might have been used.

- *Workmanship – The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.*

The integrity of workmanship is no longer intact as a result of extensive alterations. The techniques and finishes used in the construction of the building are no longer evident or discernible.

- *Feeling – A property’s expression of the aesthetic or historic sense of a particular period of time.*

Due to the loss of integrity of workmanship, materials, design, and feeling, the property’s ability to convey a sense of feeling of a 1950s commercial store has also been diminished.

- *Association – The direct link between an important event or person and a historic property.*

Research indicates that the property has no historical or architectural associations to convey, so integrity of association does not apply.

Research indicates that the property lacks historical and architectural significance. In addition, it has been heavily altered and lacks physical integrity. It does not appear to be eligible for the National Register under any criteria.

## California Register of Historical Resources

The California Register criteria for eligibility mirror those of the National Register. Therefore, the property appears to be ineligible for listing on the California Register for the same reasons discussed above.

## Los Angeles Cultural Heritage Ordinance

Because the City criteria were modeled on the National and California Registers criteria, the property appears to be ineligible for designation as an HCM for the same reasons discussed above.

## Conclusion

The property is not currently designated under national, state, or local landmark programs. The property was not identified in SurveyLA. A records search prepared by the



South Central Coastal Information Center (SCCIC) did not reveal any prior evaluations of the property. The records search revealed that the property was located within the study area for the Exposition Corridor Transit Project Phase 2; however, it does not appear to have been recorded or identified as historic as a result of these efforts. However, as the building is over 45 years of age, it was evaluated as a potential historical resource as part of the environmental review of a proposed Project on the site in compliance with CEQA. Based on the above, the property does not appear to be eligible for listing in the National and California Registers, or for designation as an HCM due to a lack of significance and integrity. Additionally, it does not appear to contribute to a potential historic district. The recommended Status Code for the building is 6Z, ineligible for designation at the national, state, and local levels through survey evaluation. Therefore, the property is not a historical resource subject to CEQA. The Project would have a less than significant impact on historical resources and no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant impact may occur if grading or excavation activities associated with a project would damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA. The Project Site and surrounding area are not within proximity of a known archaeological site.<sup>48</sup> Furthermore, as discussed above, a records search prepared by the SCCIC did not reveal any prior evaluations of the property.

Nonetheless, should archaeological resources be discovered during grading or construction activities, work would cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code (PRC) Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. In addition, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of archaeological resources, and which would be imposed on the Project as part of its land use approvals. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and

<sup>48</sup> *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, website: [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.15.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf), accessed: June 13, 2018.*

approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. Any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## 6. Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Potentially Significant Impact.** A significant impact may occur if the Project were to result in wasteful, inefficient, or unnecessary consumption of energy resources. The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. Accordingly, the Project’s consumption of energy will be calculated and further evaluated in the EIR.

**b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Potentially Significant Impact.** A significant impact may occur if the Project would conflict with a state or local plan for renewable energy or energy efficiency. As discussed

above, the Project would consume energy during construction and operation in the form of electricity, natural gas, and transportation fuel. The Project could result in a significant impact to state or local plans for renewable energy or energy efficiency if it failed to meet energy efficiency standards for equipment or prevented energy suppliers from meeting renewable energy source targets. Accordingly, the Project's consumption of energy and its effects on renewable energy plans and energy efficiency requirements will be calculated and further evaluated in the EIR.

## 7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the findings of the *Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California* (Geotechnical Report) prepared by Geotechnologies, Inc., on May 22, 2019. A copy of this report is available as Appendix C to this document. The Geotechnical

Report is an update to a preliminary report previously prepared for the Project in 2016. The 2019 report incorporates the findings of the 2016 report.

- a) **Would the project directly or indirectly cause 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.**

**Less Than Significant Impact.** The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. Surface rupture of a fault generally occurs within 50 feet of an active fault line.

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.<sup>49</sup> The nearest active fault is the Newport-Inglewood Fault, approximately two miles east of the Project Site<sup>50</sup> and, thus, well over 50 feet away, which is the range within fault rupture generally occurs. Moreover, the Project Site is not within a Preliminary Fault Rupture Study Area.<sup>51</sup> Thus, the potential for fault rupture at the Project Site would be low.<sup>52</sup> Further, the Project would be required to comply with applicable state and local building and seismic codes and implement all site- and project-specific design recommendations contained in the Geotechnical Report that has been submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval prior to Project Approval. Conformance with current Building Code requirements and site-specific design recommendations in the Geotechnical Report would minimize the potential for people on the Project Site to sustain loss, injury, or death as a result of fault rupture. The Project would involve the construction of a mixed-use structure to be utilized for commercial and residential purposes in accordance with allowed uses under existing zoning and no

<sup>49</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>50</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>51</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>52</sup> Geotechnologies Inc, *Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019.*

proposed uses would have the potential to directly or indirectly exacerbate existing potential for fault rupture. Accordingly, impacts would be less than significant and no mitigation is required. No further evaluation of this topic is required in the EIR.

## (ii) Strong seismic ground shaking?

**Less Than Significant Impact.** A significant impact would 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.

The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. According to ZIMAS, the closest surface trace of an active fault to the Project Site is the Newport - Inglewood Fault Zone (Onshore) located approximately 3.45 miles to the east.<sup>53</sup> The Upper Elysian Fault is capable of producing a maximum magnitude of 6.4.<sup>54</sup> In addition to the Upper Elysian Fault, other known active faults that could produce significant ground shaking at the Project Site include the Hollywood, Newport Inglewood, and the Whittier Faults. Although the Project Site is located within approximately 0.53 miles of the Upper Elysian Fault, it does not propose activities either during construction or operation that could cause in whole or in part strong seismic ground shaking, i.e., the Project does not include deep mining operations, fracking, or boring into the direct location of a fault line.

Based on the Geotechnical Report, the Project Site is suitable for development and the Project is feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the Geotechnical Report are included in the Project plans and are implemented during construction. The Project would comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of seismic standards appropriate to the Project Site and its Seismic Design Category. Additionally, LADBS would review the Project plans for consistency with the findings and recommendations of Geotechnical Report and the Building Code. Conformance with the Geotechnical Report findings and all current Building Code requirements. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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<sup>53</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2019.

<sup>54</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2019.



### (iii) Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. The possibility of liquefaction occurring at a given site is dependent on several factors, including: anticipated intensity and duration of ground shaking; the origin, texture, and composition of shallow sediments (in general, cohesionless, fine-grained sediments such as silts or silty sands, and areas of uncompacted or poorly compacted fills are more prone to liquefaction); and the presence of shallow groundwater.

The Project Site is not identified by the City as susceptible to liquefaction,<sup>55</sup> and the Seismic Hazards Maps of the State of California (CDMG, 1999), does not classify the site as part of the potentially “Liquefiable” area.<sup>56</sup> This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. However, a liquefaction analysis was performed by Geotechnologies, Inc, as part of the Geotechnical Report (see Appendix C).

Groundwater was not encountered during exploration performed as part of the Geotechnical Investigation, conducted to a maximum depth of 100 feet below the ground surface.<sup>57</sup> The According to the Seismic Hazard Zone Report of the Beverly-Hills 7½-Minute Quadrangle (CDMG, 1998, Revised 2005), the historic-high groundwater level for the site is 40 feet below the ground surface. The historically highest groundwater level was conservatively utilized for the liquefaction analysis.

The peak ground acceleration (PGA) and modal magnitude were obtained from the USGS websites, using the Probabilistic Seismic Hazard Deaggregation program (USGS, 2008) and the U.S. Seismic Design Maps tool (USGS, 2013). A Site Class “D” (Stiff Soil Profile) and a published shear wave velocity of 230 meters per second were utilized for Vs30 (Tinsley and Fumal, 1985) in the USGS seismic programs. A modal magnitude (MW) of 6.6 is obtained using the USGS Probabilistic Seismic Hazard Deaggregation program (USGS, 2008). A peak ground acceleration of 0.67g was obtained using the U.S. Seismic Design Maps tool. These parameters are used in the enclosed liquefaction analyses.

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<sup>55</sup> *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: March 26, 2018.*

<sup>56</sup> *Geotechnologies Inc, Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019.*

<sup>57</sup> *Geotechnologies Inc, Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019, page 14.*

The enclosed “Empirical Estimation of Liquefaction Potential” is based on Boring B3. Standard Penetration Test (SPT) data were collected at 5-foot intervals. Samples of the collected materials were conveyed to the laboratory for testing and analysis. Based on the collected SPT data, the liquefaction analysis indicates that the soils underlying the site would not be capable of liquefaction during the design-based earthquake. The site-specific liquefaction analysis included in the Appendix of the Geotechnical Report (see Appendix C) indicates that the site soils would not be capable of liquefaction during the design earthquake.

Furthermore, the Project would not propose deep mining operations or boring into the Earth’s crust into a known fault that could otherwise cause in whole or in part seismic-related ground failure. Additionally, LADBS would review the plans for consistency with the findings and recommendations of Geotechnical Investigation and the Building Code. LADBS would require that all findings and recommendations be incorporated into the Project and approved by LADBS prior to the issuance of any grading or building permits. Therefore, impacts related to seismic-related ground failure including liquefaction would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

#### (iv) Landslides?

**Less Than Significant Impact.** A significant impact may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding that could be exacerbated by a project. The Project Site is not located within an area identified by the City as having a potential for landslides, or of a known landslide.<sup>58</sup> The topography of the Project Site and surrounding area is relatively flat with gentle slopes. The Project Site is not in the path of any known or potential landslides. As such, the Project would not directly or indirectly expose people or structures to risk related to landslides. Therefore, impacts would be less than significant and no mitigation is required. No further evaluation of this topic is required in the EIR.

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

**Less Than Significant Impact.** The Project Site is currently improved with a commercial building and surface parking lot. Nearly the entire approximately 2.78-acre Project Site is developed with a structure and paved with impervious surfaces. The area surrounding the Project Site is developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the

<sup>58</sup> *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: March 26, 2018.*

grading and excavation processes, substantial erosion is unlikely to occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. Operation of the Project would not have any impact with respect to soil erosion or loss of topsoil as the entire Project Site would be developed and there is no native topsoil at this previously disturbed and developed site. Therefore, impacts would be less than significant, and no mitigation is required. No further evaluation of this topic is required in the EIR.

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

**Less Than Significant Impact.** 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. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above.

As discussed above in Question 6(a)(iii), a liquefaction analysis was conducted as part of the Geotechnical Report, which indicates that site soils would not be capable of liquefaction during 2475 year return period ground motion. Therefore, lateral spreading is considered to be remote.<sup>59</sup>

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is underlain by fill soil and natural alluvium.<sup>60</sup> The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. The Project Site is not located over an old mine or a cave and will not induce an earthquake as explained above. Therefore, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project. In addition, groundwater and petroleum are not currently being extracted from the Project Site and

<sup>59</sup> *Geotechnologies Inc, Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019.*

<sup>60</sup> *Geotechnologies Inc, Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019.*

would not be extracted as part of the Project. Thus, subsidence as a result of such activities would not occur. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site. Furthermore, safe construction practices would be exercised through required compliance with the City Building Code and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to Project Site conditions.

The Geotechnical Report also evaluated the potential for hydroconsolidation in the soil underlying the Project Site. Hydroconsolidation is a phenomena wherein soils lose volume when they are saturated. This can result in settlement of structures bearing thereon. The hydroconsolidation potential of the site soils was considered by assessing the consolidation tests of the undisturbed soil samples. The tests did not show collapse upon saturation of the sample. Based on the laboratory testing, it is the opinion of Geotechnologies, Inc. that the potential for damaging settlement due to hydrocollapse insignificant.<sup>61</sup>

Based on the Geotechnical Report, the Project Site is suitable for development and the Project is feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the Geotechnical Report are included in the Project plans and are implemented during construction. The Project would comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of seismic standards appropriate to the Project Site and its Seismic Design Category. Additionally, LADBS would review the Project plans for consistency with the findings and recommendations of Geotechnical Report and the Building Code. Conformance with the Geotechnical Report findings and all current Building Code requirements. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

**Less Than Significant Impact.** A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

The Geotechnical Investigation determined that onsite geologic materials are in the moderate expansion range based upon field soil classifications and testing. The Expansion Index was found to be 86 for a sample from Boring 1 taken from a depth of 1

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<sup>61</sup> *Geotechnologies Inc, Update of Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 3443 South Sepulveda Boulevard, Los Angeles, California, May 22, 2019.*

to 5 feet and remolded to 90 percent of the laboratory maximum density. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required.<sup>62</sup> Construction of the Project would be required to comply with the City Building Code (2017 Amendments) and the 2016 California Building Code, which include building foundation requirements appropriate to site-specific conditions. With compliance with the regulatory requirements of the California Building Code, City of Los Angeles Building Code and site-specific recommendations in the Geotechnical Investigation, impacts associated with expansive soils would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

**No Impact.** 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, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur, and no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant impact may occur if grading or excavation activities associated with a project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

No unique geologic features are located on the Project Site, which is developed with a building and surface parking lot. The Project Site and immediate surrounding area do not contain any known vertebrate paleontological resources.<sup>63</sup> Furthermore, the Project Site and surrounding area is not identified by the City as having surface sediments with unknown fossil potential.<sup>64</sup> A search of paleontology collection records conducted by the

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<sup>63</sup> City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, website: [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.15.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf), accessed: June 14, 2018.

<sup>64</sup> City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Area in the City of Los Angeles, website: [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.15.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.15.pdf), accessed: June 14, 2018

Natural History Museum of Los Angeles County for the Project area found that although there are no known vertebrate fossil localities that lie directly within the Project Site, there are vertebrate fossil localities nearby.<sup>65</sup> Although the Project Site has been previously disturbed, and no paleontological resources have been identified on the Project Site or in the vicinity, the Project would require additional ground disturbance, including excavation of approximately 45 vertical feet for the subterranean parking levels. If previously unknown paleontological resources are inadvertently found during Project construction activities including excavation and grading, the Project would be required to follow procedures as detailed in PRC Sections 5097.5 and 30244. In addition, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of paleontological resources, and which would be imposed on the Project as part of its land use approvals. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, through compliance with existing State regulations related to paleontological resources, impacts to unknown paleontological resources that could be inadvertently discovered at the Project Site would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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<sup>65</sup> *Correspondence from Samuel A. McLeod, Ph.D., Vertebrate Paleontology, Natural History Museum of Los Angeles County, December 26, 2018. (See Appendix E to this Initial Study)*

## 8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on the earth that can be measured by wind patterns, storms, precipitation, and temperature. Construction and operation of the Project would generate GHG emissions from construction equipment, workers’ vehicles, etc., which may significantly impact the environment either directly or indirectly. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

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

**Potentially Significant Impact.** A significant impact would occur if a proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Construction and operation of the Project would generate GHG emissions, which may be inconsistent or in some way represent a substantial hindrance to employing the policies or obtaining the goals of GHG-reduction plans. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.



## 9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the findings of the *Phase I Environmental Site Assessment, 3443 South Sepulveda Boulevard, Los Angeles, California* (ESA) prepared by Smith-Emerly GeoServices on April 25, 2011. A copy of this report is available as Appendix D to this document.

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

**Less Than Significant Impact.** A significant impact may occur if a project involves transport, use or disposal of hazardous materials as part of its routine operations and as a result would create a significant hazard to the public or environment. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Significant hazards are not anticipated as long as residents and commercial tenants store, use, and dispose of hazardous materials in accordance with manufacturers' instructions and handle in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other residential and commercial developments (e.g., cleaning solvents, painting supplies, batteries, etc.). Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** 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. The Project would involve removal of the commercial building and surface parking lot, and the construction of a seven-story, mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The Project Site is not located within a Methane Zone or Methane Hazard Zone.<sup>66</sup>

A Phase I Environmental Site Assessment (ESA) for the Project Site was prepared in April 2011 in order to identify recognized environmental conditions (REC) on the property.<sup>67</sup> The Phase I ESA is attached to this Initial Study as Appendix D. An REC is the presence or likely presence or any hazardous substances or petroleum products in,

<sup>66</sup> *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 21, 2018.*

<sup>67</sup> *Smith-Emery GeoServices, Phase I Environmental Site Assessment, 3443 South Sepulveda Boulevard, Los Angeles, California, April 25, 2011.*

on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

No known or suspect RECs, historical RECs, controlled RECs, or *de minimus* conditions were identified in the Phase I ESA. Moreover, while not anticipated, if contaminated soils are encountered during construction activities, such soils would be handled in accordance with City and State regulatory requirements, including but not limited to the California Department of Toxic Substances Control, LAFD, and/or LADBS. Therefore, potentially significant hazardous impacts to the public or the environment through upset or accident conditions related to RECs during construction and operation of the Project would be less than significant and no mitigation measures are required.

In addition, an asbestos and lead-based paint screening was conducted on the Project Site in 2013 (see Appendix D to this Initial Study).<sup>68</sup> The screening report concluded that no asbestos-containing building materials were identified, and no paint samples yielded a positive result for lead. Moreover, while not anticipated, if asbestos or lead are encountered during construction activities, such materials would be handled in accordance with City and State regulatory requirements, including but not limited to the South Coast Air Quality Management District, Occupational Safety and Health Administration (OSHA), California Department of Toxic Substances Control, LAFD, and/or LADBS. Therefore, potentially significant hazardous impacts to the public or the environment through upset or accident conditions related to asbestos and lead-based paint during construction and operation of the Project would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant adverse effect may occur if a project is located within one-quarter mile of an existing or proposed school and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. There is one existing school within a quarter-mile of the Project Site (Charnock Road Elementary School at 11133 Charnock Road) and no known proposed schools within one-quarter mile. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the

<sup>68</sup> *Supervalve Inc., Albertson's Store # 6168, 3443 South Sepulveda Boulevard, Los Angeles, CA 90034, Asbestos and Lead Based Paint Screening prepared by Professional Services Industries, January 15, 2013.*

maintenance of mixed-use projects incorporating residential and commercial uses (e.g., cleaning solutions, solvents, painting supplies, batteries, etc.). However, it is reasonably anticipated that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, State, and local regulations. The Project does not include any uses that are typically associated with the use of hazardous chemicals, solvents, petroleum products, and other classified hazardous materials, which are typically associated with industrial operations. The Project involves the construction and operation of a mixed-use project with a commercial and residential uses, and would not require any substances of an unusual nature that could pose a hazard. As such, the use of typical cleaning and painting materials would not create a significant hazard to any nearby schools. Additionally, as discussed above under Question 9.a), the Project is not expected to result in hazardous emissions. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**d) Would the project 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?**

**No Impact.** 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.

There are no known hazardous sites associated with the Project Site according to California Department of Toxic Substances Control's (DTSC) EnviroStor database,<sup>69</sup> State Water Resources Control Board's (SWRCB) GeoTracker database,<sup>70</sup> and DTSC's current "Cortese" list.<sup>71</sup> Furthermore, as discussed under Question 9.b, no known or suspect RECs, historical RECs, controlled RECs, or *de minimus* conditions were identified in the Phase I ESA. Also, no asbestos-containing building materials were identified, and no paint samples yielded a positive result for lead. Therefore, the Project

<sup>69</sup> California Department of Toxic Substances Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed: June 15, 2018.

<sup>70</sup> State Water Resources Control Board, GeoTracker, website: <https://geotracker.waterboards.ca.gov/map/>, accessed: June 15, 2018.

<sup>71</sup> California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese), website: [http://www.envirostor.dtsc.ca.gov/public/mandated\\_reports.asp](http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp), accessed: June 15, 2018.

is not located on a site that is included on a list of hazardous materials site, and there would be no impact, and no mitigation measures are required.

- 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 or excessive noise for people residing or working in the project area?**

**No Impact.** The nearest airport to the Project Site is the Santa Monica Airport, which is located approximately one mile to the west of the Project Site. However, the Project Site is not located within the Airport Influence Area of Santa Monica Airport.<sup>72</sup> Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A project would normally have a significant impact to hazards if a project involved possible interference with an emergency response plan or emergency evacuation plan.

Sepulveda Boulevard is a County- and City-designated disaster route.<sup>73</sup> However, the Project would only result in an impact during construction if construction resulted in road closures. No full road closures along Sepulveda Boulevard during construction are anticipated. In addition, the Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan will be developed for use during the entire construction period. The Work Area Traffic Control Plan will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts or impairment of an emergency response or evacuation.

Prior to operation of the Project, a project-specific emergency response plan would be submitted to the LAFD during review of plans as part of the building permit process.

<sup>72</sup> Los Angeles County Airport Land Use Commission, *Airports and Airport Influence Areas, June 2012, website:* [http://planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_June2012\\_rev2d.pdf](http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf), accessed: June 26, 2018.

<sup>73</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area, website:* <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: June 15, 2018; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

Furthermore, access for emergency service providers and evacuation routes would be maintained during construction. Therefore, the construction of the Project would result in a less-than-significant impact on emergency response and emergency evacuation plans, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

With respect to operation of the Project, a project-specific emergency response plan would be submitted to the LAFD during review of plans as part of the building permit process. Furthermore, no permanent road closures are anticipated as a result of the operation of the Project. Moreover, the Project would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way. Therefore, the operation of the Project would result in a less-than-significant impact on emergency response and emergency evacuation plans, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** A significant impact would occur if a project site is located near wildland areas and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

The Project Site is located within an urbanized area of the City and there are no nearby wildlands or high fire hazard terrain or natural vegetation. Additionally, the Project Site is not within a Very High Fire Hazard Severity Zone,<sup>74</sup> nor is the Project Site or surrounding area within a wildland fire hazard area.<sup>75</sup> Therefore, the Project would not directly or indirectly expose people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts related to wildland fires would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>74</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: June 15, 2018.

<sup>75</sup> City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996*.

## 10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Less Than Significant Impact.** A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code



(CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges (NPDES Permit No. CAS004001), which requires new development and redevelopment projects to incorporate stormwater mitigation measures. Depending on the type of project, either a SUSMP or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves a project site.

In addition to the SUSMP, the City institutionalized the use of Low Impact Development (LID) techniques for development and redevelopment projects. In October 2011, the City adopted the Stormwater LID Ordinance (Ordinance No. 181,899) with the stated purpose of:

- Requiring the use of LID standards and practices in future developments and redevelopments to encourage the beneficial use of rainwater and urban runoff;
- Reducing stormwater/urban runoff while improving water quality;
- Promoting rainwater harvesting;
- Reducing off-site runoff and providing increased groundwater recharge;
- Reducing erosion and hydrologic impacts downstream; and
- Enhancing the recreational and aesthetic values in our communities.

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily stormwater) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operation of the Project also has the potential to degrade water quality and/or waste discharge requirements. However, implementation of the required SUSMP and LID techniques would ensure these impacts would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?**

**Less Than Significant Impact.** Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources

outside the Los Angeles Basin. The Project would not extract groundwater or directly use wells. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**(i) Result in substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. No stream or river traverses the Project Site.

Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the “Los Angeles County MS4 Permit”), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.<sup>76</sup> ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project would be less than significant and no mitigation measures are required.

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<sup>76</sup> *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

Redevelopment of the Project Site would not alter the existing stormwater drainage pattern because the Project Site is currently fully developed with a commercial building and surface parking lot. The Project Site is currently impermeable and would remain impermeable after Project development. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

**Less Than Significant Impact.** A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. No stream or river traverses the Project Site. The Project Site is currently fully developed with a commercial building and surface parking lot. Redevelopment of the Project Site would not alter the existing drainage pattern because the surface is currently impermeable and would remain impermeable after Project development.

Furthermore, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.<sup>77</sup> This program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85<sup>th</sup> percentile, 24-hour rain event, as determined from the Los Angeles County 85<sup>th</sup> percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City.

<sup>77</sup> *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 97 et seq.*

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the DCP, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would likely reduce stormwater runoff from the Project Site compared to existing conditions.

Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily stormwater) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operation of the Project also has the potential to degrade water quality and/or waste discharge requirements. As discussed above, a SUSMP would be required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. In addition to the SUSMP, LID techniques would be required for the Project. Implementation of the required SUSMP and LID techniques would ensure these impacts would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**(iv) Would the Project impede or redirect flood flows?**

**No Impact.** According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X – Other Areas, which is a

designation for areas determined to be outside the 100-year flood hazard area.<sup>78</sup> Thus, the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

**d) In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?**

**Less Than Significant Impact.** Inundation of water, including through 100-year storm flooding, tsunami, seiche, can result in the release of pollutants as floodwaters that have encountered such pollutants (such as oil and grease deposits on driving surfaces, trash, and stored chemicals required for cleaning and maintenance) recede. However, according to the FEMA Flood Insurance Rate Map, the Project Site is within Zone X – Other Areas, which is a designation for areas determined to be outside the 100-year flood hazard area.<sup>79</sup> The Project Site is approximately 3.8 miles east of the Pacific Ocean and not within an area potentially impacted by a tsunami.<sup>80</sup>

The Project Site is within a modeled potential inundation area for the Stone Canyon Reservoir, located approximately six miles to the north.<sup>81</sup> The Stone Canyon reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake (MCE) for the site.

Furthermore, it should be noted that for purposes of conservatively mapping a dam failure inundation area, the water level contained by each dam is assumed to be the peak storage capacity, and the failure is assumed to be catastrophic (i.e., instantaneous). The greatest hazard is closest to the dam where the flood waters would have the greatest volume (and depth) and velocity which causes direct impact to structures, flooding, and severe erosion. Some property damage and injury could be caused at much greater

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<sup>78</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1595F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: June 18, 2018.*

<sup>79</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1620F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: May 2018.*

<sup>80</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1620F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: May 2018.*

<sup>81</sup> *City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996.*

distances due to collateral considerations (e.g., vehicle accidents, electrical shock). Failure of the Stone Canyon Reservoir could result in the release of pollutants as floodwaters that have encountered such pollutants (such as oil and grease deposits on driving surfaces, trash, and stored chemicals required for cleaning and maintenance) recede. The State Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. Dam safety regulations and flood plain ordinances are the main means of mitigating damage or injury due to dam failure inundation.

Considering the distance of the Project Site from the Stone Canyon Reservoir would allow for adequate forewarning and potential evacuation if necessary, and safety requirements and inspections by the U.S. Army Corps of Engineers and the State Division of Safety of Dams, impacts related to failure of dams, including the dam at Stone Canyon Reservoir, would be less than significant. With respect to potential risk of release of pollutants, operation of the Project would involve the limited use of hazardous materials typically used in the maintenance of mixed-use projects incorporating residential and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies and petroleum products).

There are also no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche. Therefore, no flooding, tsunami, or seiche events which would result in the release of pollutants due to inundation are expected to impact the Project Site. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

**e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No Impact.** As detailed in 10.(a) above, the Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe) and would be required to prepare and implement a SUSMP, in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the Project. Additionally, in accordance with NPDES requirements, a Storm Water Pollution Prevention (SWPP) Plan would be developed and implemented during Project construction. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan. Impacts would be less than significant, and no mitigation measures are required.

However, as discussed in 10.b) above, the Project would not extract groundwater or use wells. As part of the *Preliminary Geotechnical Engineering Investigation* (Geotechnical

Report) conducted by Geotechnologies, Inc. for the Project, (see Appendix C) groundwater was not encountered within the 70-foot depth explored for the Geotechnical Report. The historically highest groundwater level recorded is 40 feet above grade.<sup>82</sup> Therefore it is not expected that the Project would encounter groundwater during excavation of the subterranean parking levels. Furthermore, there is no sustainable groundwater management plan governing the Project area.<sup>83</sup> Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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<sup>82</sup> *Geotechnologies, Inc., Preliminary Geotechnical Engineering Investigation Proposed Mixed-Use Development, 3443 Sepulveda Boulevard, Los Angeles, California , March 18, 2016.*

<sup>83</sup> *Los Angeles County Waterworks District, <https://dpw.lacounty.gov/wwd/web/About/SGMA.aspx>, accessed January 2019.*

## 11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### a) Would the project physically divide an established community?

**Less Than Significant Impact.** A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project 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 Site currently consists of a commercial building and surface parking lot. The Project would demolish the existing building and construct a mixed-use building containing residences and commercial land uses. There are no existing residences on the site, or a residential use that would be physically separated or otherwise disrupted by the Project, as development currently exists within the boundaries of the Project Site, and development of the Project would remain within the boundaries of the existing Project Site. Implementation of the Project would result in further infill of an already developed community. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. Therefore, impacts would be less than significant impact, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Potentially Significant Impact.** The Project is subject to numerous regional and local land use plans, policies, and regulations as well as to the LAMC, and requests several discretionary and ministerial approvals. Therefore, impacts may be potentially significant and the Project’s potential to conflict with land use plans, policies, or regulations adopted



for the purpose of avoiding or mitigating an environmental effect will be evaluated further in the EIR.

## 12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

The Project Site is fully developed and no oil wells are present.<sup>84,85</sup> Additionally, the Site is not located within the boundaries of a major oil drilling area or within a State-designated oil field.<sup>86</sup> Furthermore, the Project Site is not located within an MRZ-2 zone.<sup>87</sup> The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

<sup>84</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: March 26, 2018.

<sup>85</sup> California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed: June 18, 2018.

<sup>86</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.

<sup>87</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, adopted September 2001.

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

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

As discussed above under responses to Checklist Question 12(a), the Project Site is not within a major drilling area or State-designated oil field, or within an MRZ-2 zone. The Project would not affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### 13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Impact.** As the Project Site is currently developed with a commercial building and surface parking lot. Sources of noise at the Project Site generally consist of traffic along area roadways and vehicles using the parking lot. Construction and operation of the Project would increase both temporary and long-term noise, which could exceed City noise standards. Additionally, the Project would introduce new permanent residential uses to the Project Site and noise levels from on-site sources could increase during operation of the Project. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

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

**Potentially Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. Groundborne vibration and groundborne noise could be generated during short-term

construction activities, including from excavation and grading. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

- c) For a project located within the vicinity of a private airstrip or 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?**

**No Impact.** The nearest airport to the Project Site is the Santa Monica Airport, which is located approximately one mile to the west of the Project Site. However, the Project Site is not located within the Airport Influence Area of Santa Monica Airport.<sup>88</sup> Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.<sup>89</sup> Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>88</sup> Los Angeles County Airport Land Use Commission, *Airports and Airport Influence Areas*, June 2012, website: [http://planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_June2012\\_rev2d.pdf](http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf), accessed: June 26, 2018.

<sup>89</sup> Los Angeles County Airport Land Use Commission, *Los Angeles County Airport Land Use Plan, Airport Influence Area figures*, adopted December 19, 1991, revised December 4, 2004; website: <http://planning.lacounty.gov/view/alup/>; accessed: June 19, 2018.

## 14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial <b>unplanned</b> population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly ( <b>for example, through extension of roads or other infrastructure</b> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less Than Significant Impact.** A significant impact may occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the area, either directly or indirectly.

### Construction

The Project would involve the demolition of an approximately 37,900 square-foot commercial building and associated surface parking lot, and the construction of a seven-story, mixed-use building with 409 apartment units and approximately 60,000 square feet of retail and restaurant space. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, the construction workers would not likely relocate their homes as a result of employment on the Project. Impacts on population and housing due to

construction activities would be less than significant and no mitigation measures are required.

## Operation

The Project would be comprised of 409 apartment units and approximately 60,000 square feet of retail and restaurant space. According to population estimates provided by the US Census Bureau, there are approximately 2.43 persons per renter-occupied unit in the City of Los Angeles.<sup>90</sup> As the Project would include up to 409 multi-family residential units, approximately 994 residents (409 x 2.43) would be generated.

SCAG's Local Profiles Report for the City estimates 2016 population, housing, and employment numbers for the City. As shown in Table B-1, Population and Housing Forecasts for the City of Los Angeles Subregion, the report estimates that there were 4,040,904 residents and 1,453,271 total housing units in the City in 2016.<sup>91</sup> Moreover, SCAG's RTP/SCS estimates the population of the City will increase to 4,609,400 residents by 2040.<sup>92</sup> Housing in the City is estimated by SCAG to increase to 1,690,300 housing units by 2040.<sup>93</sup>

**Table B-1  
Population and Housing Forecasts  
for the City of Los Angeles Subregion**

Area	Population	Households
<b>City of Los Angeles</b>		
SCAG Forecasts		
2016	4,040,904	1,453,277
2035	4,442,500	1,618,900
2040	4,609,400	1,690,300
Percent Change (%)		
2016 to 2035	+9.9	+11.3
2016 to 2040	+14.1	+16.3
Source: Southern California Association of Governments, Local Profiles Report 2017, Profile of the City of Los Angeles, May 2017, website: <a href="http://www.scag.ca.gov/Documents/LosAngeles.pdf">http://www.scag.ca.gov/Documents/LosAngeles.pdf</a> , page 3,		

<sup>90</sup> United States Census Bureau, American Community Survey, 2016, provided by Jack Tso, City of Los Angeles Department of City Planning.

<sup>91</sup> Southern California Association of Governments, Local Profiles Report 2017, Profile of the City of Los Angeles, May 2017, website: <http://www.scag.ca.gov/Documents/LosAngeles.pdf>, page 3, accessed: April 2019.

<sup>92</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: [http://www.scag.ca.gov/Documents/2016\\_2040RTPSCS\\_FinalGrowthForecastbyJurisdiction.pdf](http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf), accessed: April 2019.

<sup>93</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: [http://www.scag.ca.gov/Documents/2016\\_2040RTPSCS\\_FinalGrowthForecastbyJurisdiction.pdf](http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf), accessed: April 2019.

**Table B-1  
Population and Housing Forecasts  
for the City of Los Angeles Subregion**

Area	Population	Households
<i>accessed: April 2019. Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction website: <a href="http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf">http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf</a>, accessed: April 2019.</i>		

## Population

As mentioned above, the Project would include 409 multi-family residential units, which could generate approximately 994 residents (409 x 2.43). According to SCAG data, the City of Los Angeles subregion had a total population of 4,040,904 persons in 2016. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 401,596 between 2016 and 2035, and by 568,496 persons between 2016 and 2040. The addition of the new residents housed by the Project would be within the SCAG growth projection, representing approximately 0.24 percent of the Citywide total growth for the period of 2016 to 2035, and approximately 0.17 percent of the Citywide total growth for the period of 2016 to 2040. This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the Project would be less than significant and no mitigation measures are required.

## Housing

With respect to housing, the Project would introduce up to 409 multi-family residential units to the area. Estimates extrapolated from SCAG data projects the Citywide housing supply to increase by 165,623 units between 2016 and 2035, and by 237,023 units between 2016 and 2040. The 409 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.24 percent of the Citywide total housing growth for the period of 2016 to 2035, and approximately 0.17 percent of the Citywide total growth for the period of 2016 to 2040. This increase would not be considered a substantial increase in housing for the area as the addition of 409 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the Project would be less than significant and no mitigation measures are required.

## Infrastructure

The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into



undeveloped areas. The Project does not involve the extension of roadways or infrastructure. As the Project would be supported by the existing infrastructure, indirect population growth impacts would be less than significant.

Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere.

The Project Site currently consists of a commercial building and surface parking lot and, thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. The Project would introduce a net increase of 409 residential units to the City, on a site currently containing no residential uses. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## 15. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire Protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police Protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

**Potentially Significant Impact.** A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance were exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

The nearest fire station to the Project Site is Fire Station 43, located at 3690 Motor Avenue, approximately 1.3 miles to the east of the Project Site. The Project would construct approximately 409 apartment units and approximately 60,000 square feet of retail and restaurant space at a site currently occupied by a commercial building and a surface parking lot. As discussed above, implementation of the Project would generate new residents on the site. In addition to the residents, employees and patrons to the commercial spaces would increase the on-site population. The redevelopment of the site

and on-site population could increase the number of emergency calls to LAFD. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

- b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?**

**Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station – the construction of which could cause significant environmental impacts.

The Project would construct approximately 409 apartment units and approximately 60,000 square feet of retail and restaurant space at a site currently occupied by a commercial building and surface parking lot. As discussed above, implementation of the Project would generate new residents on the site. In addition to the residents, employees and patrons to the commercial spaces would increase the on-site population. The Project would generate a permanent on-site population where there currently is none, thereby, potentially increasing the number of service calls to LAPD from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would potentially increase as a result of the increased on-site activity and increased traffic on adjacent streets. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

- c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?**

**Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs.

The Project would involve the construction of 409 residential units over approximately 60,000 square feet of retail and restaurant space. As shown in Table B-2, Project Estimated Student Generation, the Project is expected to increase the local student population.

**Table B-2**  
**Project Estimated Student Generation**

<b>Grades</b>	<b>Students per Household<sup>a</sup></b>	<b>Total Students</b>
TK-6	0.2269	92.8021
7-8	0.0611	24.9899
9-12	0.1296	53.0064
	<b>Total</b>	<b>170.7984</b>
<sup>a</sup> Source: Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, page 5.		

The following LAUSD schools currently serve the Project Site:

- Charnock Road Elementary School
- Daniel Webster Middle School
- Venice Senior High School

To reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for LAUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.<sup>94</sup> The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law. Therefore, with the payment of these fees, impacts to school facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

<sup>94</sup> Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.

- d) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?**

**Less Than Significant Impact.** A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project, necessitating new or physically altered parks – the construction of which could cause significant environmental impacts.

The Project would be comprised of 409 apartment units and approximately 60,000 square feet of retail and restaurant space. The Project would increase the residential population within the Project area and, thus, would increase demand for public parkland based on the standard minimum parkland-to-population ratio identified by the City. Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide more than the required amount of open space on the Project Site. Based on the total number of units proposed, the Project would require 43,500 square feet of open space pursuant to LAMC Section 12.21 G.2. The Project would provide approximately 50,863 square feet of open space (see Table A-1 in Section A, Project Description) and residential amenities in several distinct areas. The open space would include approximately 13,500 square feet of private open space, 34,963 square feet of outdoor common space, and 2,400 square feet of indoor common space. Five courtyards would be located on the third level and a sky deck would be provided on the seventh level. The Project's various amenities would include including a swimming pool, clubroom, and courtyards. Approximately 270 of the residences would include private balconies of approximately 50 square feet. Even so, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact would be reduced to a less than significant level through the required payment of the Park Fee to the City for the construction of a residential for rent development. Monies collected as part of the Park Fee are is placed in an in lieu account and used exclusively for the acquisition and development of park and recreational sites and facilities. Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** 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 a project, necessitating new or physically altered facilities – the construction of which could cause significant environmental impacts.

The Project would construct approximately 409 apartment units and approximately 60,000 square feet of retail and restaurant space at a site currently occupied by a commercial building and surface parking lot. As discussed above, implementation of the Project would generate new residents on site. In addition to the residents, employees and patrons to the commercial spaces would increase the on-site population. The new residents could result in an increased demand for library materials, and potentially result in the need for new or expanded library facilities, the construction of which could have an adverse significant impact. On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.<sup>95</sup> Library funding is now mandated under the City Charter to be funded from property taxes. Therefore, impacts to library facilities would be less than significant and no mitigation measures are required.

In addition, no roadway improvements and/or dedications are anticipated as part of the Project, the construction of which could have an adverse significant impact. Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>95</sup> *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L.*

## 16. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would cause substantial physical deterioration of the park facilities. As discussed in response to Checklist Question 15.d), above, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact would be reduced to a less than significant level through the required payment of the Park Fee to the City for the construction of a residential for rent development. Monies collected as part of the Park Fee are placed in an in lieu account and used exclusively for the acquisition and development of park and recreational sites and facilities. Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As discussed in Checklist Question 15.d), the Project's future residents could increase the use of parks and recreational facilities in the

area, some of which may not have the capacity to serve residents. However, this impact would be reduced to a less than significant level through the required payment of the Park Fee to the City for the construction of a residential for rent development. Monies collected as part of the Park Fee are placed in an in lieu account and used exclusively for the acquisition and development of park and recreational sites and facilities. Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.



## 17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Potentially Significant Impact.** A significant impact may occur if a project would conflict with a program, plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system. The Project would require the use of a variety of construction vehicles throughout the Project construction. Typical construction schedules create trips outside of the traffic peak hours. It is anticipated that there would be no hauling during the PM peak hour, and that construction workers would arrive at the Project Site prior to the AM peak hour, which is typical construction industry practice. Operation of the Project would generate new residents in addition to on-site employees and patrons of the commercial spaces, which would result in increased vehicle trips on area roadways that could degrade existing performance levels of roadway facilities.

To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The CMP designated a transportation network including all State highways and some arterials within the County to be monitored by local jurisdictions. If a standard of measure deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the CMP

program. The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. When a CMP analysis is required, the CMP methodology requires the analysis of traffic conditions at all CMP arterial monitoring intersections where a project would add 50 or more trips during either the AM or PM weekday peak hours. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where a project would add 150 or more trips in either direction during either AM or PM weekday peak hours. The Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to and in the vicinity of the Project Site. Therefore, the impact of the Project's additional traffic on CMP intersections and freeway segments may be significant and will further be evaluated in the EIR.

To encourage and facilitate the use of public transportation and bicycle use, the proposed Project would provide approximately 255 bicycle parking spaces, comprised of 60 bicycle spaces for commercial uses (including 30 short-term spaces and 30 long-term spaces) and 195 spaces for the residential uses (including 18 short-term and 177 long-term), to meet LAMC requirements. Nonetheless, operation of the Project would generate new residents, employees, and visitors on the Project Site which may increase the demand for public transit, which may affect the performance of existing transit conditions in the area. Therefore, the Project's potential impacts may be significant. The Project's consistency with applicable programs, plans, ordinances, and policies related to traffic and circulation, pedestrian flows, mass transit utilization, and bicycle routes will be further evaluated in the EIR.

**b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?<sup>96</sup>**

**Potentially Significant Impact.** A significant impact may occur if a project would cause a conflict in Congestion Management Program (CMP). The nearest CMP facility to the Project Site is the I-405 Freeway, which is adjacent to the western boundary of the Project Site.<sup>97</sup> The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. When a CMP analysis

<sup>96</sup> While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

<sup>97</sup> Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Exhibit 2-3, page 13, website: [http://media.metro.net/docs/cmp\\_final\\_2010.pdf](http://media.metro.net/docs/cmp_final_2010.pdf), accessed: April 19, 2017.

is required, the CMP methodology requires the analysis of traffic conditions at all CMP arterial monitoring intersections where a project would add 50 or more trips during either the AM or PM weekday peak hours. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where a project would add 150 or more trips in either direction during either AM or PM weekday peak hours. Traffic would be added to nearby roadways with the development of the Project, potentially including the I-405 freeway. Therefore, the impact of the Project's additional traffic on CMP intersections and freeway segments may be significant and will be evaluated in an EIR.

**c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less Than Significant Impact.** A significant impact may occur if a project includes new roadway design or introduced 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. No geometric design features or incompatible land uses would be introduced with the Project that would create significant hazards to the surrounding roadways. The Project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. The Project would have two vehicular access points. Vehicle access would be available from Palms Boulevard and Sepulveda Boulevard, which would lead into the parking garage for the commercial and residential uses within the three subterranean parking levels. The Project's driveways would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**d) Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** A significant impact may occur if a project's design would not provide emergency access meeting the requirements of LAFD, or threatened the ability of emergency vehicles to access and serve the project site or adjacent uses.

As detailed in 9.f) above, the Project Site is located adjacent to Sepulveda Boulevard, a designated disaster route, which may be utilized for an evacuation route during an emergency.<sup>98</sup> The Project constitutes a private development located on private land, and

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<sup>98</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area, website:*  
<http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed:

does not propose alteration to the public rights-of-way. No full road closures along Sepulveda Boulevard during construction are anticipated. However, if lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. In addition, the Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan will be developed for use during the entire construction period. The Work Area Traffic Control Plan will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts or impairment of an emergency response or evacuation.

With regards to operation, the Project would comply with access requirements from the LAFD and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic is required in the EIR.

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*June 15, 2018; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

## 18. Tribal Cultural Resources

<p><b>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</b></p>	<p><b>Potentially Significant Impact</b></p>	<p><b>Less Than Significant with Mitigation Incorporated</b></p>	<p><b>Less Than Significant Impact</b></p>	<p><b>No Impact</b></p>
<p>a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>ii). A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant, pursuant to criteria set forth in subdivision 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

**Potentially Significant Impact.** Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCR) and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a proposed project. Although the Project Site has been previously disturbed, the Project would include the excavation of three levels of subterranean parking. Therefore, the potential exists for the Project to significantly impact a site, feature, place cultural landscape, sacred place or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. As the AB 52 notification/consultation process has not been completed to date, and as the Project would include excavation to depths not previously disturbed in order to construct a three-level subterranean parking structure, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant, pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Potentially Significant Impact.** Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider

measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe. As the AB 52 notification/consultation process has not been completed to date, and as the Project would include excavation to depths not previously disturbed in order to construct a three-level subterranean parking structure, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

## 19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electrical power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Potentially Significant Impact.** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the construction of new water or wastewater treatment facilities or expansion of existing facilities would be required, the construction of which could cause significant environmental effects.



The Project would increase the demand for water and the generation of wastewater and, thus, increase the demand of treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required, which may have a significant impact on the environment. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

As discussed above in Section 10, impacts related to stormwater would be less than significant. A SUSMP would be required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. In addition to the SUSMP, LID techniques would be required for the Project. Implementation of the required SUSMP and LID techniques would ensure these impacts would be less than significant.

The Project would result in an increase in consumption of electrical power and natural gas during both construction and operation. Existing supply facilities may need to be expanded or relocated. Therefore, the Project's potential to result in significant environmental effects resulting from expansion or relocation of electrical and natural gas supply facilities will be further evaluated in the EIR.

The Project would require the construction of new on-site telecommunication lines and connection to existing off-site lines. Therefore, the potential for resulting environmental effects to be significant will be further evaluated in the EIR.

**b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

**Potentially Significant Impact.** A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified.

The demand for water would increase with the development of 409 apartment units and approximately 60,000 square feet of commercial uses when compared to the Project Site's existing condition as one commercial building and a surface parking lot. Therefore, impacts may be potentially significant and this potential impact will be further evaluated in an EIR.

- c) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Potentially Significant Impact.** The Project would increase the generation of wastewater conveyed to the wastewater treatment system. Further analysis is required to determine whether the Project's added wastewater could result in a significant impact on the City's wastewater treatment capacity. This potential impact will be further evaluated in an EIR.

- d) **Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less Than Significant Impact.** 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.

## Construction

Implementation of the Project would generate construction and demolition waste. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of the existing building and parking lot that would be disposed of as inert waste. Much of this material would be recycled and salvaged to the maximum extent feasible at a minimum of 75 percent diversion from the landfill.

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 919.4 tons of solid waste<sup>99</sup>, remove approximately 8,304 tons of asphalt, and result in approximately 3,278.4 tons of demolition debris<sup>100</sup> over the entire construction period. Construction solid waste including asphalt, demolition debris, and solid waste related to construction materials and activities is estimated to total approximately 12,501.8 tons.

<sup>99</sup> A construction waste generation rate of 4.02 pounds per square foot was used. 457,412 square feet of construction multiplied by 4.02 pounds is 1,838,796 pounds (919.4 tons). Source: U.S. EPA, *Characterization of Building-Related Construction and Demolition Debris in the United States*, Table A-2, June 1998.

<sup>100</sup> A demolition waste generation rate of 173.00 pounds per square foot was used. 37,900 square feet of demolition multiplied by 173.00 pounds is 6,556,700 pounds (3,278.4 tons). 96,000 square feet of asphalt demolition multiplied by 173.00 pounds is 16,608,000 pounds (8,304 tons). Source: U.S. EPA, *Characterization of Building-Related Construction and Demolition Debris in the United States*, Table A-4, June 1998.

This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. However, the California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it can be assumed that the Project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills. The construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Waste Management Plan 2016 Annual Report* (the “2016 Annual Report”) concludes that there is current capacity of 56.34 million tons available in the County for the disposal of inert waste.<sup>101</sup> Therefore, the Project-generated demolition debris of 11,582.4 tons (i.e., asphalt and demolition waste) and construction waste of 919.4 tons (i.e., construction debris) would represent a very small percentage of the inert waste disposal capacity in the region. This would be a less-than-significant impact, as the Project would not exceed state or local standards or capacity infrastructure or to impair the attainment of solid waste reduction goals.

## Operation

The Project would generate solid waste that is typical of a mixed-use project and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in Table B-3, Project Estimated Daily Solid Waste Generation, the Project would generate approximately 6,714 ppd of solid waste.

**Table B-3  
Project Estimated Daily Solid Waste Generation**

Land Use	Size	Generation Rate <sup>a</sup> (pounds/employee/day)	Employees <sup>b</sup>	Total Generation (pounds/day)
Residential	409 units	12.23	--	5,002.07
Retail	19,900 sf	10.53	53.93	567.87
Grocery	25,000 sf	10.53	67.75	713.41
Restaurant	15,100 sf	10.53	40.92	430.90
<b>Total Solid Waste Generation</b>				<b>6,714.25</b>
<sup>a</sup> Generation rates are from the City of Los Angeles LA CEQA Thresholds Guide, 2006 (commercial rate used).				

<sup>101</sup> County of Los Angeles Department of Public Works, *Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017, page 33. Note that this capacity is at the Azusa Land Reclamation because it is the only permitted Inert Waste Landfill in the County.

**Table B-3  
Project Estimated Daily Solid Waste Generation**

<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>a</sup> (pounds/employee/day)</b>	<b>Employees<sup>b</sup></b>	<b>Total Generation (pounds/day)</b>
<sup>b</sup> 0.00271 employees per average square foot (neighborhood shopping centers category). Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 14, page 19. Source (table): EcoTierra Consulting, 2019				

All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the Project would divert 50 percent of its solid waste generated pursuant to the proposed City and County Specific Plans, thereby diverting this waste from landfills. Nonetheless, it is conservatively assumed that all 6,714 ppd of the Project's solid waste would be disposed of at regional landfills.

Solid waste generated within the City is disposed of at privately-owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential developments within the City. It is reasonably anticipated, then, that the Project Applicant would contract with a local commercial solid waste hauler following completion of the Project. As is typical for most solid waste haulers in the greater Los Angeles Area, the hauler would most likely separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. Most commonly, the City is served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including construction and demolition (C&D) waste. Chiquita Canyon Landfill is also a Class III landfill accepting non-hazardous solid waste including C&D waste that serves the area.

As of May 31, 2018, the Sunshine Canyon Landfill had approximately 77.9 million cubic yards (approximately 21 million tons) of remaining capacity.<sup>102</sup> As of July 25, 2017, the Chiquita Canyon Landfill is authorized to operate until the end of 2024.<sup>103</sup> As such, the Sunshine Canyon and Chiquita Canyon landfills have adequate permitted daily intake to accommodate the estimated 6,714 ppd of solid waste generated by the Project. Therefore, the Project would not exceed state or local standards or capacity infrastructure or to impair the attainment of solid waste reduction goals. Impacts would be less than

<sup>102</sup> Cal Recycle, Solid Waste Information System, Sunshine Canyon City/County Landfill, website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000> accessed January 2019.

<sup>103</sup> Los Angeles Board of Supervisors, Conditional Use Permit for Chiquita Canyon Landfill, approved July 25, 2017.

significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less Than Significant Impact.** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations.

The Project would generate solid waste that is typical of a residential and neighborhood commercial mixed-use project, and would be consistent with all federal, State, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as required by AB 939 and AB 341). Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## 20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** As detailed in 9.f) above, the Project Site is located adjacent to Sepulveda Boulevard, a designated disaster route, which may be utilized for an evacuation route during an emergency.<sup>104</sup> The Project constitutes a private development located on private land, and does not propose alteration to the public rights-of-way. No full road closures along Sepulveda Boulevard during construction are anticipated. However, if lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. With regards to operation, the Project would comply

<sup>104</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area, website:* <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: June 15, 2018; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

with access requirements from the Los Angeles Fire Department (LAFD) and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic is required in the EIR.

**b) Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No Impact.** As detailed in 9.g) above, the Project Site is located within a highly developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,<sup>105</sup> nor is the Project Site or surrounding area within a wildland fire hazard area.<sup>106</sup> Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. Accordingly, no impact would occur and no mitigation is required. No further evaluation of this topic is required in the EIR.

**c) Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**Less Than Significant Impact.** The Project would involve the demolition of existing buildings and construction of new buildings in a highly urbanized area in the Palms-Mar Vista-Del Rey community of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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<sup>105</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: June 2018.

<sup>106</sup> City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996*.

- d) **Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**Less Than Significant Impact.** The Project would be required to comply with all developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for fire at the Site. Any installation of on-Site power lines required to provide the Project with electricity and connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity is relatively flat with no major slopes that would be susceptible to flooding or landslide are located nearby. Accordingly, the Project would not expose people or structures to such hazards and impacts would be less than significant. No further evaluation of this topic is required in the EIR.



## 21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** A significant impact could occur if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections. As noted in the foregoing analysis, potentially significant impacts may result which will be further evaluated in an EIR.

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

**Potentially Significant Impact.** A significant cumulative impact may occur if a project, in combination with the related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The impacts of the Project could potentially combine with the impacts of related projects. For those environmental issues discussed above that are to be analyzed in the EIR, the EIR will include an analysis of the cumulative impacts associated with those environmental issues. The following is a list of the cumulative impacts analyses to be included in the EIR:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Public Services (Fire Protection and Police Protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water, wastewater, storm water, electrical power, natural gas, telecommunications facilities)

For those environmental issues that this Initial Study determined do not need additional analysis in the EIR, the cumulative impacts analysis is provided below.

### **Aesthetics**

**Less Than Significant Impact.** Development of the Project in combination with other development projects would likely result in an intensification of existing prevailing land uses in an already urbanized area of the City. Development of any additional projects is expected to generally occur in accordance with adopted plans. With respect to the overall visual quality of the surrounding neighborhood, similar to the Project, any additional projects would be required to submit a landscape plan and signage plan (if proposed) to the Department of City Planning for review and approval prior to the issuance of building permits. Any approvals granted to related projects are expected to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood.

Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Agriculture and Forestry Resources**

**Less Than Significant Impact.** Development of the Project in combination with other development projects would not result in the conversion of State-designated Farmland or existing agricultural activities or zoning to non-agricultural uses. The Project Site and surrounding area are also not under a Williamson Act contract. Moreover, the Project Site is not zoned for forest land, timberland, or timberland production, nor would the Project result in the loss of forest land. Thus, the Project would not contribute to a cumulative loss of forest land to non-forest land uses. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Biological Resources**

**Less Than Significant Impact.** As discussed above, the Project would not result in a potentially significant impact to biological resources. The Project Site and other area development projects are located in a developed area of the City. It is unknown whether or not any of the properties on which other development projects are located contain biological resources; however, the Project Site does not contain candidate, sensitive, or special status species or their habitat, riparian habitat or sensitive natural communities, or wetlands, and is not subject to any habitat conservation plans. Because the Project would have no impact on such resources, it would not have the potential to contribute cumulatively to any related significant impacts. Although the Project would remove eight queen palm trees, as discussed above under response to Checklist Questions 4.d) and 4.e), none of the trees that would be removed is a protected species. As such, the Project would not contribute to a cumulative impact with regard to the removal of protected trees. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Cultural Resources**

**Less Than Significant Impact.** As discussed above, the Project would result in less than significant impacts to historical, archaeological, or paleontological resources. It is unknown whether or not any of the properties on which other development projects are located contain cultural resources. Any related project sites that contain historical or archaeological resources or human remains would be required to comply with regulations similar to those that are required for the Project. Since the Project would not cause a significant impact with respect to cultural resources, there is no potential for the Project to result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## Geology and Soils

**Less Than Significant Impact.** Geological hazards are site-specific and there is little, if any, cumulative relationship between a project and other nearby projects. Nonetheless, cumulative development in the Project vicinity would increase the overall population in the area, thus, increasing the potential risk of exposure to seismically-induced hazards. However, with adherence to applicable local, State, and federal regulations, building codes, comprehensive engineering practices, and site-specific design considerations, geologic hazards would be less than significant. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## Hazards and Hazardous Materials

**Less Than Significant Impact.** Development of the Project in combination with other projects in the area could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to other development projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant and, therefore, would not substantially contribute to a cumulative impact. Furthermore, the related projects will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State, and federal laws pertaining to hazardous materials, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## Hydrology and Water Quality

**Less Than Significant Impact.** With respect to construction impacts, it is unknown whether or not any other development projects would have overlapping construction schedules with the Project. However, similar to the Project, all development projects would be required to comply with the City Building Code and NPDES requirements. Assuming compliance, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with other development projects would result in the further infilling in an already developed area. As discussed above, the Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, other development projects would also drain to the surrounding street system or otherwise retain stormwater on-site.

The runoff associated with other development projects would either be directed in non-erosive drainage devices to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. These projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain or the on-site cisterns. Additionally, all other development projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Mineral Resources**

**No Impact.** As discussed in the response to checklist Item 12, the Project would result in a no impact on mineral resources, on or off-site. It is not known if any other projects in the vicinity would result in the loss of availability of known mineral resources. Regardless, the Project would not have a considerable contribution to the potential cumulative impact on mineral resources. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Population and Housing**

**Less Than Significant.** Housing, and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The Project evaluated in this Initial Study and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative population and housing growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time and the Project would not contribute to a cumulatively considerable effect with respect to housing and population growth. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Public Services - Schools**

**Less Than Significant Impact.** As discussed above, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, other development projects would be required to pay

school fees to the appropriate school district wherein their site is located. The payment of school fees would fully mitigate any potential impacts to school facilities. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Public Services - Parks**

**Less Than Significant Impact.** As discussed above, the Project would result in a less-than-significant impact on parks and recreational facilities. With the exception of affordable housing projects, the Project and other development projects that involve the development of residences would be required to pay a Dwelling Unit Tax or other similar purpose fees such as Quimby fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Public Services - Libraries**

**Less Than Significant Impact.** Other development projects in the area that involve the development of residences could increase the demand upon library services. However, library funding is mandated under the City Charter to be funded from property taxes, including those assessed against the Project, which would increase with the new development. The Project, as well as other development projects, would be required to pay these fees as applicable. It is unknown whether or not any other development projects would require new or expanded libraries. If there were an impact on libraries due to the combined impacts of development projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### **Recreation**

**Less Than Significant Impact.** Other development projects in the area that involve the development of residences would potentially result in an increase in residents in the area. In the absence of the other development incorporating project-specific mitigation, cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. The development projects that involve the development of residences would be required to pay applicable park fees. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## Utilities and Service Systems – Solid Waste

**Less Than Significant Impact.** Implementation of the Project in combination with other development projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and other development projects generate C&D waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor, it is anticipated that future cumulative development would also implement similar measures to divert C&D waste from landfills. As of May 31, 2018, the Sunshine Canyon Landfill had approximately 77.9 million cubic yards (approximately 21 million tons) of remaining capacity.<sup>107</sup> As of July 25, 2017, the Chiquita Canyon Landfill is authorized to operate until the end of 2024.<sup>108</sup> Thus, these landfills would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts from the C&D waste would be less than significant and no mitigation measures are required.

Operation of the Project in conjunction with other development projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2015 Annual Report projects waste generation and available landfill capacity through 2030. Based on the 2015 Annual Report, Los Angeles County has the projected disposal capacity through 2030.<sup>109</sup> Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for other development projects. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## Wildfire

**Less Than Significant Impact.** As discussed in the response to checklist item 20, the Project would result in a less-than-significant impact with respect to wildfire. The Project Site is located adjacent to Sepulveda Boulevard, a designated disaster route, which may

<sup>107</sup> Cal Recycle, *Solid Waste Information System, Sunshine Canyon City/County Landfill*, website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000> accessed January 2019.

<sup>108</sup> Los Angeles Board of Supervisors, *Conditional Use Permit for Chiquita Canyon Landfill*, approved July 25, 2017.

<sup>109</sup> Los Angeles County Department of Public Works, *Countywide Integrated Waste Management Plan, 2015 Annual Report*, published December 2015, page 7.

be utilized for an evacuation route during an emergency.<sup>110</sup> No full road closures along Sepulveda Boulevard during construction are anticipated. However, if lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. The Project Site is not within a Very High Fire Hazard Severity Zone,<sup>111</sup> nor is the Project Site or surrounding area within a wildland fire hazard area.<sup>112</sup> Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. No roads, fuel breaks, or emergency water sources would be installed or maintained as part of the Project. Installation of any required power lines or other utilities would be done in accordance with applicable City building codes and utility provider policies. The Project would be required to comply with all developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for fire at the Site. Therefore, the Project would not result in a cumulatively considerable impact and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** The analysis contained in this Initial Study concludes that the Project may result in potentially significant impacts, which will be further evaluated in an EIR.

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<sup>110</sup> Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area*, website:

<http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: June 15, 2018; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996*.

<sup>111</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: June 15, 2018.

<sup>112</sup> City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996*.