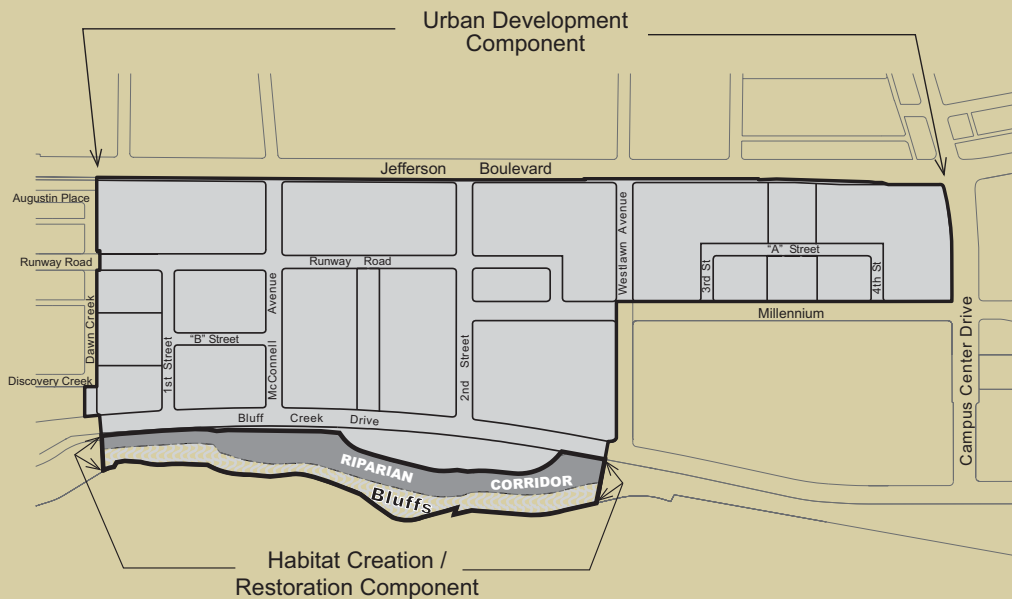


# DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) VILLAGE AT PLAYA VISTA



## VOLUME I BOOK 3

**DRAFT ENVIRONMENTAL IMPACT REPORT**

**(DEIR)**

**VILLAGE AT PLAYA VISTA**

**VOLUME I**

**BOOK 3**

City of Los Angeles  
2003

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**L. PUBLIC SERVICES**  
**(1) FIRE PROTECTION**

---

**1.0 INTRODUCTION**

This section addresses Proposed Project impacts on fire prevention, suppression and paramedic services. The analysis addresses the demand for service and the availability of infrastructure needed for the provision of fire protection service. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

**2.0 SETTING**

**2.1 Regulatory Framework**

Within the City of Los Angeles, fire prevention and suppression services are provided by the City Fire Department, as mandated in Section 520 of the City of Los Angeles Charter adopted in July 2000, and Section 22.70 of the Los Angeles Administrative Code. The Los Angeles Fire Code, a portion of the Los Angeles Municipal Code, prescribes laws for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises and to prescribe such other laws as it may be the duty of the Fire Department to enforce.<sup>384</sup> The Fire Protection and Prevention Plan (Plan), an element of the City's General Plan, serves as a guide to City departments, government offices, developers and the public for the construction, maintenance and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed by the Plan include the following:

- Fire station distribution and location,
- Required fire flow (i.e., water supply),
- Fire hydrant standards and locations,

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<sup>384</sup> *City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02., Amended in Entirety, Ordinance Number 162,123, Effective May 12, 1987.*

- Access,
- Emergency ambulance service, and
- Fire prevention activities.<sup>385</sup>

Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm) as well as the duration of flow. Requirements for fire flow vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (PSI) is required to remain in the water system while the required gpm is flowing, in order to be considered adequate by City of Los Angeles Fire Code standards.<sup>386</sup> Fire flow criteria are generally based on land use, with greater intensity land uses requiring higher flows from a greater number of hydrants. Maximum response distances allowed by the Fire Department between a Project site and a first-in engine company or a truck company<sup>387</sup> vary with the fire flow requirement, as shown in Table 135 on page 967.

The Citywide General Plan Framework has additional policies and objectives for Fire Protection in the City of Los Angeles. These policies and objectives call for the monitoring of service, and for the City to investigate all avenues in providing funding and improving service infrastructure as population growth occurs in the City.

## 2.2 Existing Conditions

The City Fire Department operates four fire stations in the vicinity of the Project site which would initially respond to incidents in the Proposed Project. These fire stations and their response distances are identified in Figure 85 on page 968 and listed in Table 136 on page 967.

Table 137 on page 969 provides a listing of the types and number of emergency incidents for 2002. As indicated from this data, the total annual fire and paramedic incidents for 2002 are as follows: 3,322 for Station 5; 1,679 for Station 95; 3,468 for Station 63; and 2,920 for Station 62. The total number of incidents for all fire stations in 2002 was 11,388.<sup>388</sup>

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<sup>385</sup> *City of Los Angeles Fire Protection and Prevention Plan, adopted January 1979.*

<sup>386</sup> *Information based on Section 57.09.06 of the City of Los Angeles Fire Code.*

<sup>387</sup> *Truck Companies are staffed for, and equipped with, an aerial ladder truck.*

<sup>388</sup> *Los Angeles City Fire Department, Planning Section, Captain/Paramedic William N. Wells, fax correspondence to PCR Services Corporation, April 24, 2003.*

Table 135

## SERVICE RADII IN MILES BY REQUIRED FIRE FLOW

Required Fire Flow (Gallons per minute)	Engine Company Service Radii (Miles)	Truck Company Service Radii (Miles)
Less than 2,000	1.50	2.0
2,000 to 4,500	1.50	2.0
5,000 to 8,500	1.00	1.5
9,000 to 12,000	0.75	1.0

Source: City of Los Angeles, Fire Prevention and Protection Plan, 1979.

Table 136

CITY FIRE FACILITIES WITHIN THE VICINITY OF THE PROJECT SITE <sup>a</sup>

City Fire Facility <sup>a</sup>	Response Distance <sup>b</sup>	Area of First-In District <sup>a</sup>
<b>Fire Station No. 5</b> 6621 West Manchester Avenue Task Force Station – Truck and Engine Company Paramedic Ambulance – Battalion 4 Headquarters Staffing – 13	2.7 miles	5.9 sq. miles
<b>Fire Station No. 95</b> 10010 International Road Task Force Station – Truck and Engine Company Paramedic Ambulance Staffing – 11	5.7 miles	3.3 sq. miles
<b>Fire Station No. 63</b> 1930 Shell Avenue Task Force Station – Truck and Engine Company Paramedic Ambulance Staffing – 11	3.2 miles	3.75 sq. miles
<b>Fire Station No. 62</b> 3631 Centinela Avenue Single Engine Company Basic Life Support (BLS) Ambulance Staffing – 6	3.0 miles	4.9 sq. miles

<sup>a</sup> Fire Facility information confirmed by Los Angeles City Fire Department, Planning Section, Captain/Paramedic William N. Wells. Fax correspondence to PCR Services Corporation, April 24, 2003.

<sup>b</sup> Represents estimated response distance to the intersection of McConnell Avenue and Jefferson Boulevard. Response distance may increase or decrease for other locations within the Project site.

Source: PCR Services Corporation.

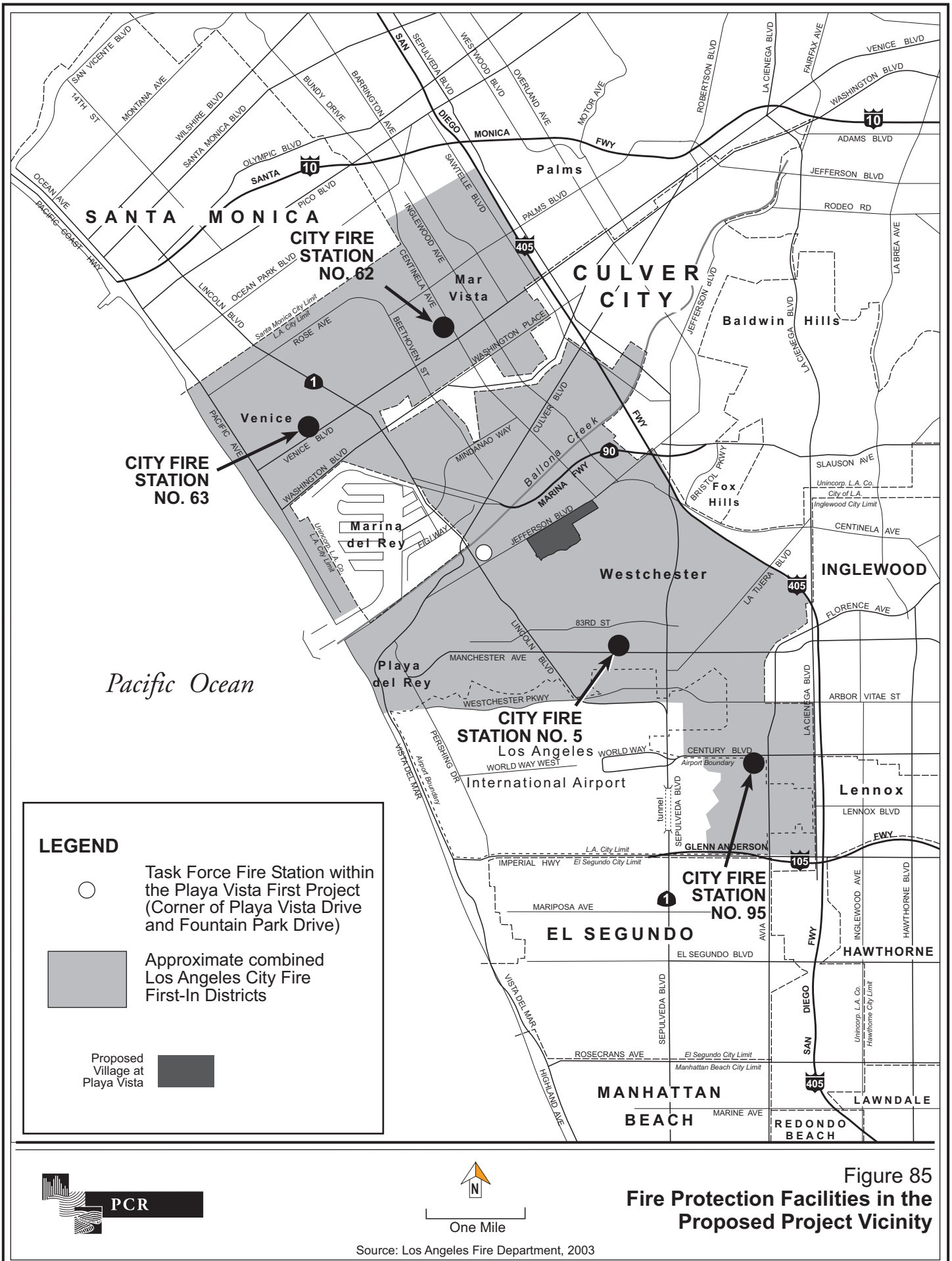


Figure 85  
**Fire Protection Facilities in the  
 Proposed Project Vicinity**

Table 137

## CITY FIRE AND PARAMEDIC INCIDENTS DATA

	Number of Emergency Incidents		
	Daily <sup>a</sup>	Yearly	Percent
<b>FIRE STATION 5</b>			
Basic Life Support EMS	2.2	803	24.2
Advanced Life Support EMS	4.4	1,606	48.4
Fire and Other Incidents	<u>2.5</u>	<u>913</u>	<u>27.5</u>
<b>Total Station 5</b>	<b>9.1</b>	<b>3,322</b>	<b>100.0</b>
<b>FIRE STATION 95</b>			
Basic Life Support EMS	1.2	438	26.1
Advanced Life Support EMS	1.9	694	41.3
Fire and Other Incidents	<u>1.5</u>	<u>548</u>	<u>32.6</u>
<b>Total Station 95</b>	<b>4.6</b>	<b>1,679</b>	<b>100.0</b>
<b>FIRE STATION 63</b>			
Basic Life Support EMS	3.0	1,095	31.6
Advanced Life Support EMS	4.4	1,606	46.3
Fire and Other Incidents	<u>2.1</u>	<u>767</u>	<u>22.1</u>
<b>Total Station 63</b>	<b>9.5</b>	<b>3,468</b>	<b>100.0</b>
<b>FIRE STATION 62</b>			
Basic Life Support EMS	2.1	767	26.3
Advanced Life Support EMS	4.6	1,679	57.5
Fire and Other Incidents	<u>1.3</u>	<u>475</u>	<u>16.3</u>
<b>Total Station 62</b>	<b>8.0</b>	<b>2,920</b>	<b>100.0</b>
<b>TOTAL</b>			
Basic Life Support EMS	8.5	3,104	27.2
Advanced Life Support EMS	15.3	5,585	49.0
Fire and Other Incidents	<u>7.4</u>	<u>2,701</u>	<u>23.7</u>
<b>Total for All Stations</b>	<b>31.2</b>	<b>11,388</b>	<b>100.0</b>

<sup>a</sup> Year 2002, daily Incident Data provided by the Los Angeles Fire Department Planning Section: Fax correspondence to PCR Services Corporation from William N. Wells, Captain/Paramedic, April 24, 2003. Data converted to yearly incidents, multiplying by 365 days.

Source: PCR Services Corporation, 2003.

Each fire station has geographic boundaries, or first-in districts, within which it responds to incidents on a first-due basis. The first-in district for each station encompasses the following:

- 5.9 square miles for Fire Station 5,
- 3.3 square miles for Fire Station 95,
- 3.75 square miles for Fire Station 63, and



- 4.9 square miles for Fire Station 62.

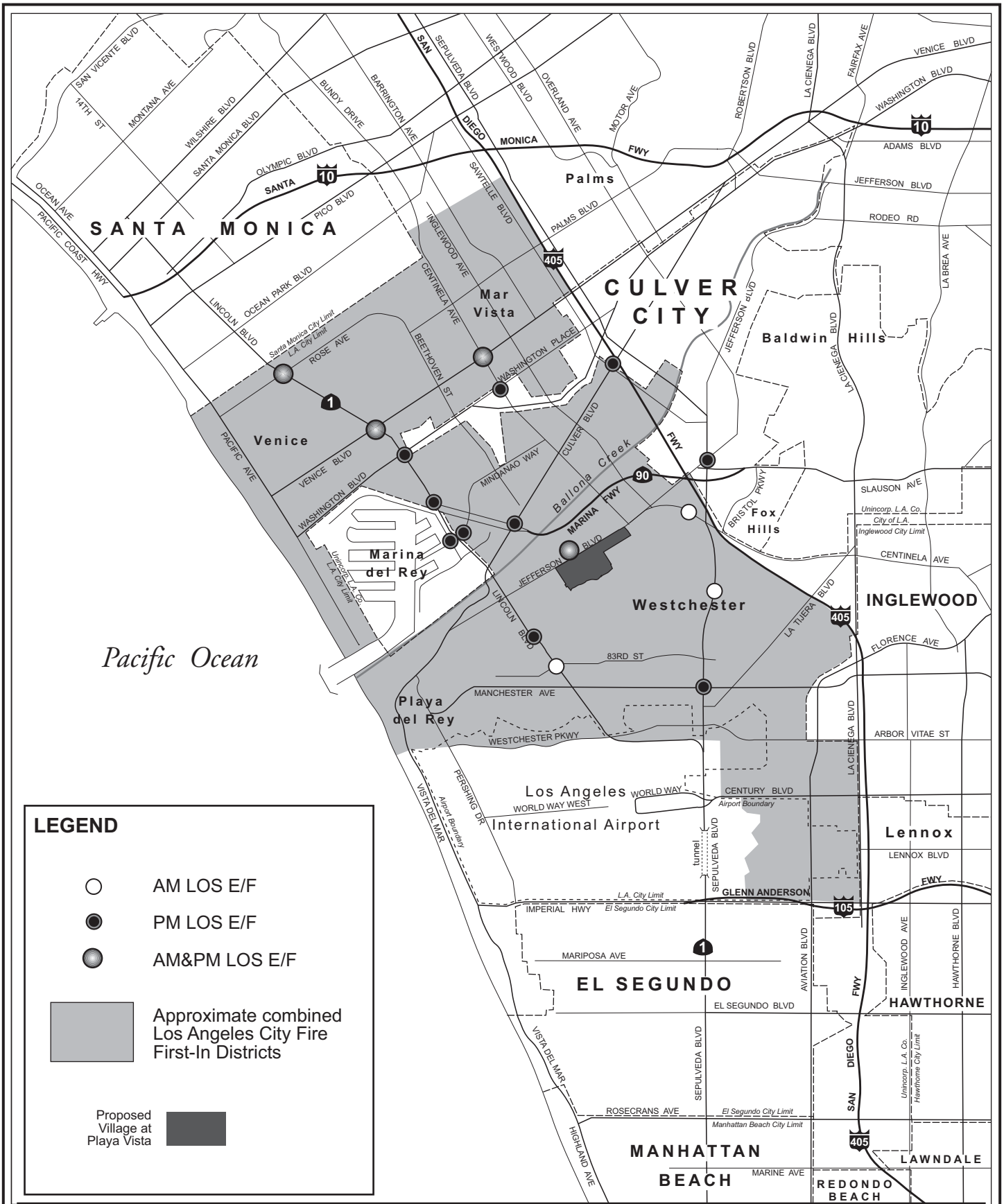
Fire stations also respond to incidents in adjacent first-in districts. As shown in Figure 85 on page 968, the combined adjacent first-in districts for Fire Stations 5, 95, 63, and 62 are generally bounded by the San Diego Freeway (405) and Culver City to the east, Westchester Parkway, Lincoln Boulevard and Imperial Highway to the south, the Pacific Ocean to the west, and the Santa Monica City boundary to the north, exclusive of the Marina del Rey area which is served by the Los Angeles County Fire Department.

The combined annual ratio of emergency incidents per 1,000 residents and employees within the combined first-in district boundaries provides a measure of the level of fire protection services that would be needed by the new population brought into the area by the development of the Project site. Based on the 11,388 year 2002 emergency incidents for Fire Stations 5, 95, 63, and 62, and an estimated residential population of 160,787 residents and on estimated employment population of 53,981 employees for the combined first-in districts, the level of fire protection service for emergency incidents was approximately 53 emergency incidents per 1,000 residents and employees.<sup>389</sup>

Emergency access for the City Fire Department would be provided by the existing and proposed street systems. Level of service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the minimum satisfactory service level in urban areas. LOS E and LOS F intersections within the service area of the four fire stations providing response to the Proposed Project area are shown in Figure 86 on page 971. As indicated a total of 3 intersections within the this area are operating at LOS E or F in the A.M. peak hour, 10 intersections are operating at LOS E or F in the P.M. peak hour, and 4 intersections are operating at LOS E or F in both the A.M. and P.M. peak hours, under the current 2003 baseline conditions.<sup>390</sup>

<sup>389</sup> The number of EMS responses per year is taken from Table 137 on page 969 and is based on information provided by the Los Angeles City Fire Department. The level of fire protection services ratio is determined by adding the estimated residential population (160,787) and the estimated employment population (53,981); then dividing the total EMS incidents (11,388) by the total population (214,768) ) 1,000. This suggests that the level of fire protection service for EMS incidents was approximately 53 Emergency Incidents per 1,000 population. Population data for the service area was estimated by PCR Services Corporation by aggregating census data for the census tracts located within the service area. Population is estimated for 2002, the year for which the most recent incident data is available. Residential population data reflects data provided in the 2000 census adjusted to year 2002 by interpolating to the 2005 population estimate included in SCAG forecasts developed in support of their Regional Transportation Plan (RTP). The employment data is based on interpolation of year 2000 and year 2005 estimates in the RTP.

<sup>390</sup> Further discussion of the roadway operating conditions is provided in Section IV.K, Traffic and Circulation.



**LEGEND**

- AM LOS E/F
- PM LOS E/F
- AM&PM LOS E/F

Approximate combined Los Angeles City Fire First-In Districts

Proposed Village at Playa Vista

**Figure 86**  
**LOS E and F Intersections in the**  
**Service Area - 2003 Baseline**

Source: Los Angeles Fire Department, 2003

The City Fire Department's response time to calls located in areas surrounding the Project site may also vary as a result of the response distance and traffic conditions at the intersections involved; however, the standard response times for emergency calls for the Westchester/Playa del Rey area is approximately 5.2 minutes, for the Mar Vista area is approximately 5.3 minutes, and for the Venice area is 5.0 minutes.<sup>391</sup>

In addition to the existing fire stations in the vicinity of the Proposed Project, a new Task Force Station with Paramedic Ambulance and Battalion Headquarters is expected to be located at the intersection of Playa Vista Drive and Fountain Park Drive within the adjacent Playa Vista First Phase Project. The new station will be approximately 0.5 mile west of the Proposed Project site. A Task Force Fire Station, as defined by the City of Los Angeles Fire Department, consists of both an Engine and a Truck Company. As part of the Conditions of Approval for the First Phase Playa Vista Project, a maximum of either 2,000 residential units or 750,000 sq.ft. of office space is allowed prior to the start of construction of the Task Force Fire Station. The construction of the Task Force Fire Station is required to be completed within three years of the start of its construction.

Further, the approval of Proposition F in November 2000 provides funding to support the relocation and expansion of the above described LAFD Fire Stations 5 and 62. The future locations of these facilities have not yet been determined, however the stations will be relocated within their current service areas, with expected completion in 2006. The relocated Fire Station 5 will be 23,750 sq.ft. (versus the current 9,640-sq.ft. facility) and includes a regional fire/paramedic station, an apparatus storage area, and a multi-purpose room. Fire Station 5 will also include a heliport location and a large-scale incident staging area.<sup>392</sup> The new Fire Station 62 will be 15,250 sq.ft. (versus the current 4,190-sq.ft. facility) and include a standard fire/paramedic station and an equipment and supplies storage area. The new facility will have additional storage capacity and a door to potentially house a truck.<sup>393</sup>

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<sup>391</sup> Wells, William, Captain/Paramedic, City of Los Angeles Fire Department, Planning Section. Telephone communication January 9, 2003.

<sup>392</sup> Los Angeles City Department of Public Works, Bureau of Engineering, New Regional Fire/Paramedic Station 5, Westchester, [http://eng.lacity.org/projects/fire\\_bond/FS5new.htm](http://eng.lacity.org/projects/fire_bond/FS5new.htm).

<sup>393</sup> Los Angeles City Department of Public Works, Bureau of Engineering, Standard Fire/Paramedic Station 62, Mar Vista, [http://eng.lacity.org/projects/fire\\_bond/FS62new.htm](http://eng.lacity.org/projects/fire_bond/FS62new.htm).

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

The analysis considers three components: fire flow infrastructure, demand for services, and emergency access. The discussion of fire flow infrastructure identifies water supply availability and infrastructure improvements for providing adequate services to the site. The analysis of demand discusses the increase in Emergency Medical Service (EMS) incidents, as an indicator of the level of service increases. The analysis prorates existing service levels per number of residents and employees to the Proposed Project. Emergency access discusses roadway service levels and the implications of those levels on emergency access.

Estimated population for the Proposed Project and Related Projects is based on the data generated in Section IV.J, Population, Housing and Employment, of the EIR. The population base included in the analysis is inclusive of both residents and employees, since the Proposed Project is a mixed-use development with residential and commercial/office components.

#### 3.2 Significance Threshold

The Draft Los Angeles CEQA Thresholds Guide (p. J.2.3) states the following regarding project impacts on fire services:

- 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.

#### 3.3 Project Design Features

The Proposed Project does not include additional fire station facilities. The Proposed Project would be required to provide design features consistent with the Fire Protection Regulations established within the Los Angeles Municipal Code.

#### 3.4 Project Impacts

##### 3.4.1 Proposed Project Impacts

**Fire Flow Infrastructure.** As shown in Figure 85 on page 968, the City Fire Department operates four stations, (Stations 5, 95, 63, and 62) in the vicinity of the Project.

Table 136 on page 967 delineates the locations of each of the fire stations and the type of equipment they have available in relationship to the areas.

City Fire Stations No. 5 and 63 are currently the closest of the four stations serving the Proposed Project area. The stations are approximately three miles from the Project site.

The Proposed Project would require the provision of fire flows per City requirements for the type of development proposed. It is expected that the required fire flow would be 4,000 gallons per minute, based on the types of uses included in the Project.<sup>394</sup> The City of Los Angeles Fire Prevention and Protection Plan establishes maximum response distances for fire stations that are tied to fire flow requirements. The maximum response distance for a required flow of 4,000 gallons per minute flow would differ depending on whether or not the fire company is an Engine Company or a Truck Company. If the fire company is an Engine Company, the maximum response distance would be 1.5 miles. Whereas, if the fire company is a Truck Company, the maximum response distance would be two miles. Although Stations No. 5 and 63 have both Engine and Truck Companies, the Proposed Project would be beyond the service radius established by the City.

As described in the Setting Section above, one of the Conditions of Approval for the First Phase Project is the provision of a Task Force Fire Station, consisting of both Engine and Truck Companies. Such a station has been designated for a parcel at Playa Vista Drive and Fountain Park Drive. Its provision would allow service to the Proposed Project site in accordance with City Fire Department standards, thereby precluding a need for an additional new station, or expansion or consolidation of existing facilities. As such, impacts would be less than significant. However, if the station were not provided, a significant impact could occur.

The Proposed Project's fire flow requirements would be met from the main water line in Jefferson Boulevard. The construction of a new regulator station on that line has been recommended as a mitigation measure for the Proposed Project in Section IV.N.(1), Water Consumption, of the EIR. This regulator station will be built in the vicinity of Jefferson Boulevard and Mesmer Avenue. This facility ensures the appropriate off-site fire flow pressures and fire flow rates for the development at the Proposed Project site. At the review of each Proposed Project tract, the proposed on-site infrastructure plan will be reviewed by the Fire Department to assure that the required flow levels will be available. Mitigation Measures are included below which require the provision of the requirements specified by the Fire Department. Meeting this standard would mitigate significant impacts with regard to the availability of fire flow.

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<sup>394</sup> Letter between Psomas and the Los Angeles Fire Department, March 18, 2003. Michael J. Crehan, P.E., Vice President at Psomas and Terry O'Connell, Hydrant unit, Los Angeles Fire Department.

The Proposed Project will be developed in accord with all statutory and Fire Department-required improvements to preclude significant impacts. In addition, numerous mitigation measures are included below which: (a) prescribe site design requirements needed to accommodate emergency service; and (b) appropriate review procedures for Fire Department review of the Proposed Project.

**Demand.** The estimated increase in emergency incidents has been determined by prorating the existing ratio of incidents per capita in the service district to the residential/employee population that would occur on the Proposed Project site. As described in the Setting Section above, the service district currently includes 160,787 residents and 53,981 employees, for a total population of 214,768 persons, and has 11,388 emergency incidents per year. This equates to a rate of 53 emergency incidents per 1,000 residents and employees. Applying this rate to the anticipated 5,720 residents and 1,180 employees estimated to reside and work in the Proposed Project results in an estimated 366 emergency incidents per year.<sup>395</sup> This would be equivalent to about a 3 percent increase over the 11,388 emergency incidents within the primary response area of Stations No. 5, 95, 63, and 62 as a result of the Proposed Project. Therefore, the Proposed Project would increase the workload of Stations No. 5 and 63 with a potential reduction in the level of service to the existing community if there is no corresponding increase in manpower and equipment. The Proposed Project would generate revenues to the City that could be applied toward the provision of staffing for existing and anticipated facilities. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socioeconomic issue that may be addressed further by the decision-makers. If such funds are not applied to sufficient staffing of the anticipated new fire station, a potentially significant impact could occur.

**Emergency Access.** Emergency access to the Proposed Project would be provided by the existing and proposed street systems. City review of street widths, street lighting and street signage will be based on an evaluation of requirements for the provision of emergency access.

The City Fire Department's response time to calls located in and around the Proposed Project site may increase as a result of the response distance and the intersections involved. The standard response times for emergency calls for the Westchester/Playa del Rey area is approximately 5.2 minutes, for the Mar Vista area is approximately 5.3 minutes, and for the Venice area is 5.0 minutes.<sup>396</sup>

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<sup>395</sup> *The estimates of potential residential and employee populations for the Proposed Project are taken from Section IV.J, Population, Employment and Housing, Table 104 on page 770, which explains the assumptions and methodology upon which the population estimates are based.*

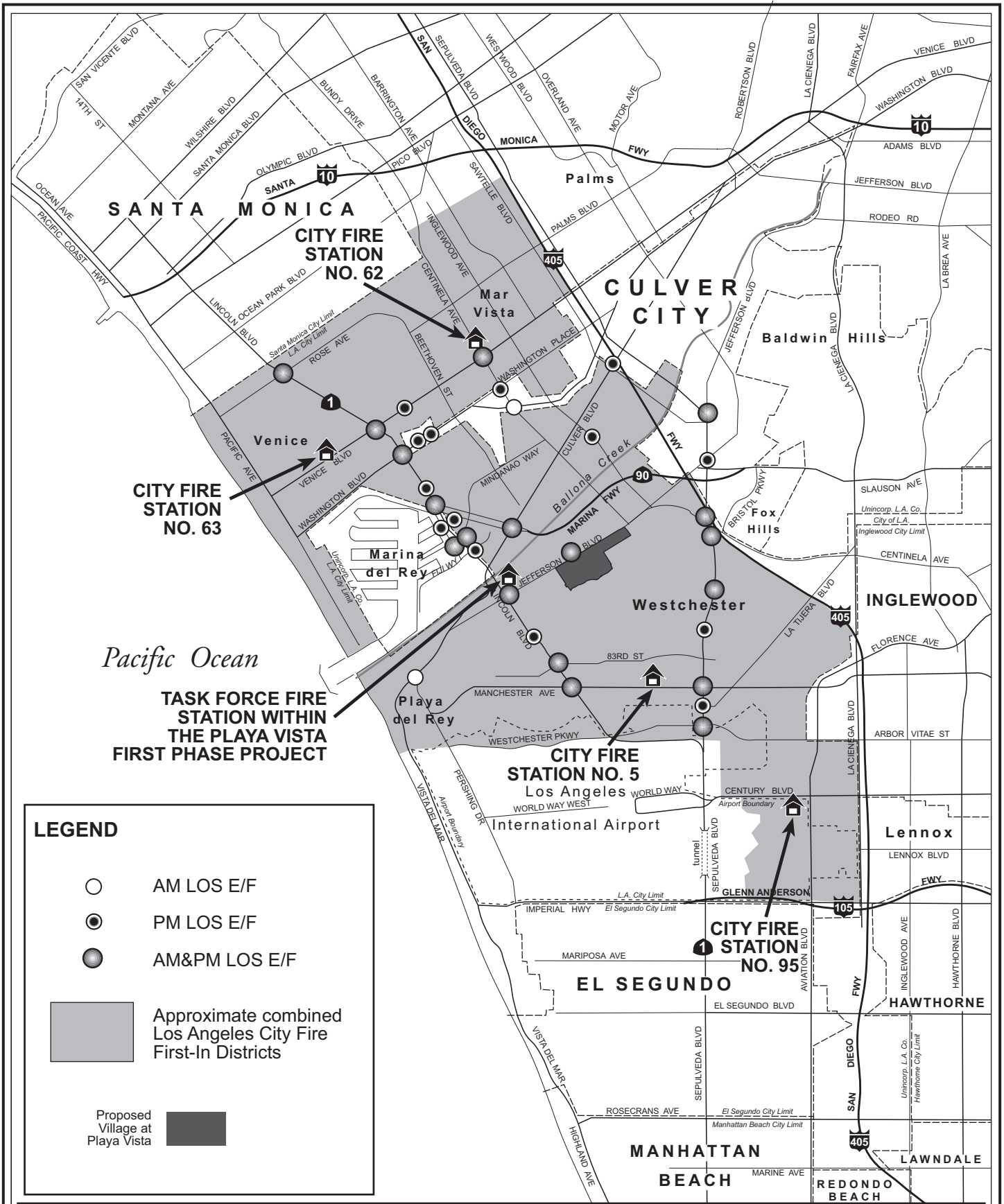
<sup>396</sup> *Wells, William, Captain/Paramedic, City of Los Angeles Fire Department, Planning Section. Telephone communication January 9, 2003.*

Generally, the Fire Department considers intersections operating at LOS E and F to be non-conducive to the flow of emergency vehicles. As indicated in Figure 87 on page 977, with implementation of the Proposed Project and its traffic mitigation measures, in 2010 there will be 2 intersections within the service area that are operating at LOS E or F in the A.M. peak hour, 14 intersections that will be operating at LOS E or F in the P.M. peak hour, and 18 intersections that will be operating at LOS E or F in both the A.M. and P.M. peak hours. Many of these intersections lie within routes to the Proposed Project site from the four existing fire stations. Encountering such intersections could reduce response times, subject to the ability of the fire department to select the most efficient routes and implement emergency travel procedures. As noted above, the existing fire stations are located beyond the recommended distances for service to the Proposed Project, and therefore these intersections would contribute to the Proposed Project's out-of-distance effects regarding these locations.

Of the intersections operating at LOS E or F, only one is located between the proposed site for the fire station at the intersection of Playa Vista Drive and Fountain Park Drive and the Proposed Project site. That intersection can be avoided by fire and emergency vehicles responding to the Proposed Project site. Further, implementation of the Proposed Project with mitigation will enhance operations at that location to an acceptable LOS (LOS A), thus enhancing emergency access to the site, and other surrounding areas. As described, above the new station is adequately located to serve the Proposed Project site. Further, the Proposed Project will be designed to meet all regulations to accommodate emergency vehicles. Therefore, the Proposed Project site can be served from this fire station, without emergency access impediments that would necessitate the addition of a new fire station, or expansion, consolidation or relocation of an existing facility. If this station is not built, the potentially significant impact noted above regarding service from the existing stations could be exacerbated by intervening intersections operating at LOS E and F.

While the Proposed Project will add additional travel trips to local roadway network, the Project will also include mitigation measures that will enhance travel conditions at many locations. As discussed in Section IV.K, Transportation, implementation of the Proposed Project along with its mitigation measures would improve the projected 2010 average volume to capacity (v/c) ratios within the traffic study area. This indicates an improvement in overall average system performance during the peak hours.

**Summary of Impacts.** The significance threshold for the provision of fire services indicates that a significant impact would occur, if a project would require the addition of a new fire station, or the expansion, relocation, or consolidation of existing facilities to maintain service. It is anticipated that the Proposed Project would be served by the new Fire Station located at Playa Vista Drive and Fountain Park Drive. No additional facilities would be required, and there would not be a significant impact. If this facility is not constructed or sufficiently staffed, a significant impact could occur.



**LEGEND**

- AM LOS E/F
- ◐ PM LOS E/F
- AM&PM LOS E/F

Approximate combined Los Angeles City Fire First-In Districts

Proposed Village at Playa Vista

**Figure 87**  
**LOS E and F Intersections in the**  
**Service Area - 2010 with**  
**Project and Mitigation Measures**



Source: Los Angeles Fire Department, 2003



### 3.4.2 Equivalency Program Impacts

The preceding fire protection analysis addressed impacts associated with the Proposed Project relative to the following issues: (1) adequacy of fire flow infrastructure and station facilities to serve the proposed development; (2) the increase in the demand for services; and (3) emergency access provisions.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations. There would be no changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project.

However, the exchange of office uses to retail and/or assisted living units would alter the site uses, and therefore, the size of the site population. The exchange of office space to retail space has the effect of lowering the number of employees that could occur on the Project site. The exchange of office space to assisted living units increases the number of employees and residents on site. The number of employees associated with the assisted living units is greater than the number of employees associated with the prescribed reduction in office employees. These changes would affect the estimated 386 emergency incidents estimated for the Proposed Project.

As described in Section IV.J, Population, Housing and Employment, the combined number of residents and employees for the Proposed Project is 6,900. As further described there, in Table 107 on page 784, the All Retail Equivalency scenario has 6,552 residents and employees or 348 less than the Proposed Project. Under this scenario the demand for services would be less than for the Proposed Project. The All Assisted Living Equivalency Scenario and Retail Plus Assisted Living Scenario have 7,134 residents and employees and 6,852 residents and employees, respectively. These are increases of 234 and 48, respectively. Based on the rate of 56 emergency incidents per 1,000 residents and employees that was used in the above analysis, the emergency incidents would increase by 13 incidents per year (to 399 incidents) under the Assisted Living Equivalency Scenario, by 3 incidents per year (to 389 incidents) under the Retail Plus Assisted Living Equivalency Scenario. It may be noted that the rate of emergency incidents for assisted living may be slightly higher than for other site uses. Therefore, the two scenarios that include assisted living may generate higher demand for fire protection services than the Proposed Project. The Proposed Project would generate revenues to the City that could be applied toward the provision of staffing for existing and anticipated facilities. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socioeconomic issue that may be addressed further by the decision-makers. If such funds are not

applied to sufficient staffing of the anticipated new fire station, a potentially significant impact could occur.

All LAMC requirements for Fire Protection (as discussed in Subsection 2.1 above) and/or recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, below) to minimize potential impacts on fire protection services under the Proposed Project would be implemented, as appropriate, under the Equivalency Program. As noted above, development under the Equivalency Program would be served by the same fire flow infrastructure and station facilities as the Proposed Project and would include a substantially similar development program, with site provisions for site access. Like the Proposed Project, none of the Equivalency Scenarios would require the expansion, consolidation or relocation of an existing facility to maintain service, so long as the new fire station at the intersection of Playa Vista Drive and Fountain Park Drive is provided. Without that facility potentially significant impacts could occur under all of the Equivalency Scenarios as is the case with the Proposed Project, without the new facility.

### **3.4.3 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These infrastructure improvements would reduce the traffic and water utility impacts of the Proposed Project. The water regulator station will supply the proper fire flow pressure and fire flow rates to serve the Proposed Project. They would not add new population to the area, nor would they add new buildings. Therefore, they would not increase the demand for fire services, beyond the demand identified in the above analyses. The off-site improvements would improve traffic flow and help to facilitate emergency access within the community. Long term impacts of the Proposed Project on fire services, inclusive of the off-site improvements would be less than significant.

Construction of the off-site improvements would cause short-term impacts on emergency travel. During construction, temporary lane closures and detours would be planned to provide for, and maintain, emergency access routes especially near critical facilities such as hospitals and fire stations. The fire department would select the most efficient travel routes and implement emergency travel procedures to minimize impacts. No significant impact would occur.

## 4.0 MITIGATION MEASURES

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The Proposed Project would be required to meet the requirements of all Municipal Codes for Fire Protection. In addition, the following measures have been added to address: (1) the contingency of the planned Fire Station not being implemented; (2) to address additional design considerations; and (3) to provide appropriate review procedures for Fire Department review of the Proposed Project.

- If the proposed fire station required for the adjacent First Phase Project is not built prior to the issuance of the first building permit, an agreement shall be reached between the Applicant and the Fire Department which provides for adequate fire services/facilities by the Department.
- Prior to the issuance of any building permit, a plot plan shall be submitted to the City Fire Department for approval.
- Prior to the issuance of any building permit, definitive plot plan and specifications including fire prevention features for the Project shall be submitted to and approved by the City Fire Department. Sprinklers may be required after review of the plot plans.
- Adequate off-site public and on-site private fire hydrants shall be required. The exact number and location of the hydrants shall be determined after the City Fire Department reviews the plot plan. The Project Developer shall be required to pay for any hydrant installations required by the Fire Department.
- Adequate vehicular accessways around all multi-story buildings shall be required by the Fire Department where buildings exceed 28 feet in height.
- Where fire apparatus will be driven onto the road level surface of a subterranean parking structure, the structural foundation of the subterranean parking structures shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
- To mitigate potential significant impacts on access, the Applicant shall covenant that all current public and private streets shall remain open to free travel of emergency vehicles.
- The Applicant shall provide for all infrastructure improvement, including water main improvements, and/or expansion necessary to meet City Fire Department fire flow

standards, in accordance with a phasing schedule to the satisfaction of the City Fire Department.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

Implementation of the Proposed Project would result in the need for increased staffing for existing fire protection facilities and the City's fire protection services load. In addition to the new tax revenues from development of the Proposed Project that could be used for funding of the expansion of fire services and facilities, and the City Fire Station required for the adjacent Playa Vista First Phase Project, the Applicant will provide resources and improvements as required by all statutory regulations. Further, the Proposed Project would implement its mitigation measures. It is expected that the new fire station in the adjacent Playa Vista First Phase Project, with sufficient staffing, will avoid a need for further fire station additions, expansions or consolidations and no significant impacts would occur. Nonetheless, a contingency mitigation measure has been included to assure that adequate fire services and facilities are available to meet the needs of the Proposed Project, if the new station is not built. After mitigation, no significant impacts would occur. This conclusion applies the Proposed Project, the Equivalency Program and the construction of the Project's off-site improvements.

## 6.0 CUMULATIVE IMPACTS

Ninety-six projects have been identified as being related to the development of the Proposed Project. However, only 17 of the 96 projects are within the first-in districts (i.e., those stations that respond first) of the fire stations which serve the Proposed Project.

The cumulative analysis area includes the service area of Stations No. 5, 95, 63, and 62. Related projects numbered 1-7, 10, 24-25, 35-36, 40 (the adjacent Playa Vista First Phase Project), 42, 46, 91 and 95 are included within the primary response area. The population from the related projects within the service district is shown in Table 138 on page 982. The number of residents and employees for each of the related projects, individually, is presented in Table 107 on page 784 of Section IV.J, Population, Housing and Employment.

**Fire Flow Infrastructure.** Development of the related projects, as well as the Proposed Project, is subject to review for adequacy of water flow to the respective project sites, and the projects cannot be developed until such flows are available. Off-site facilities to serve the larger area are under the jurisdiction of the Department of Water and Power, which anticipates future water needs on the basis of regional forecasts, and familiarity with the related development projects in the vicinity of the Proposed Project. As indicated above, additional enhancements to

Table 138

**RESIDENTS AND EMPLOYEES IN RELATED PROJECTS  
(SERVICE AREA FOR FIRE STATIONS NO. 5, 95, 63, AND 62)**

	<b>Proposed Project</b>	<b>Related Projects<sup>a</sup></b>	<b>Background Growth</b>	<b>Total</b>
<b>Residents</b>	<b>5,720</b>	<b>13,488</b>	<b>3,372</b>	<b>22,580<sup>b</sup></b>
<b>Employees</b>				
Office	700	30,620	3,062	34,382
Retail	400	877	88	1,365
Sound Stages		665	67	732
Production and Stage Support		1,450	145	1,595
Community Serving	80	240	24	344
Hotel		1,485	149	1,634
Industrial		6,578	658	7,236
Restaurant		147	15	162
Health Club		129	13	142
Mixed-Use		206	21	227
MU-Non-residential (sq.ft.)		230	23	253
Car Dealership (sq.ft.)		802	80	882
Parking Structure (Spaces)		6	1	7
<b>Totals Employees</b>	<b>1,180</b>	<b>43,435</b>	<b>4,346</b>	<b>48,961<sup>b</sup></b>

<sup>a</sup> Includes related projects located within the service area: Related projects numbered 1-7, 10, 24-25, 35-36, 40 (the Playa Vista First Phase Project), 42, 46, 91, and 95. The number of residents and employees for each of the related projects, individually, is presented in Table 107 on page 784 of the Population, Housing and Employment Section of the EIR.

<sup>b</sup> The total number of residents and employees is 71,541. Under the Equivalency Program, this number could increase by 234 to a total of 71,775.

Source: PCR Services Corporation.

support water flow in the Proposed Project area were required as mitigation measures to the adjacent Playa Vista First Phase Project.

A Los Angeles City Fire Department Station containing both an Engine and a Truck Company has been required by the Conditions of Approval for the adjacent Playa Vista First Phase Project at Playa Vista Drive and Fountain Park Drive. As long as the station is appropriately staffed, the location of the proposed Fire Station would provide fire protection to the Proposed Project, and to the related projects within its service area, thus reducing travel distances from the nearest station.

In addition, two new station relocations and expansions are funded and expected to be completed in 2006: Station 5 and Station 62. Station 5 will be upgraded to a Regional Fire/Paramedic Station, and will also include a heliport, reserve apparatus storage space, expanded equipment maintenance capabilities, and community use facilities. Station 62 also

includes new enhancements. (As described in Subsection 2.2, above.) The proposed enhancements for these stations are intended to meet current and anticipated needs within their District areas. The funding for both of these stations is provided by Proposition F that was approved in November 2000. Sites for these stations have not been identified, but the stations will be located to serve the needs of their current districts.

New development would in most cases fall within recommended distances of one of the five anticipated fire stations. If a development should fall beyond the recommended distances, the fire department can require sprinkler systems as mitigation measures under the Municipal Code (LAMC 57.09.07).

Developers of the individual related projects, as well as the Proposed Project, would provide for all statutory and Fire Department-required improvements to facilitate the provision of fire services.

Cumulative impacts would be less than significant. If anticipated new facilities are not built, a potentially significant cumulative impact could occur. This conclusion applies the Proposed Project, the Equivalency Program and the construction of the Project's off-site improvements.

**Emergency Access.** Future issues with regard to emergency access for related projects will be evaluated for related projects on a case-by-case basis. It is expected that individual related projects will be reviewed by the Fire Department and will be designed to facilitate emergency access and mitigated as required. Further, related projects will typically be required to mitigate their traffic impacts thus reducing their effect on emergency access as well as general travel. Cumulative increases in traffic could have could have an effect on roadway conditions subject to the ability of the fire department to select the most efficient routes and implement emergency travel procedures. The number of intersections in the service district operating at LOS E or F under the 2010 Baseline Conditions is 84 intersections during the A.M. peak hour and 104 intersections during the P.M. peak hour. With the Proposed Project and Mitigation the numbers are 85 (plus 1) and 102 (less 2) for the A.M. and P.M. peak hours, respectively. As discussed in Section IV.K.(1), Traffic and Circulation, the Proposed Project with its mitigation measures would improve the projected 2010 average volume to capacity ratios within the traffic study area. Implementation of the Project's off-site improvements would contribute to cumulative effects on emergency travel. In the long term, they would improve roadway operating conditions and enhance emergency travel conditions. Cumulative effects with regard to the Equivalency Program would be the same as with the Proposed Project.

**Demand.** As indicated in Table 138 on page 982, the Proposed Project and the other related projects would add an additional 22,580 residents to the service areas of the City Fire Station Nos. 5, 95, 63, and 62. The Proposed Project and related projects would also generate

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48,961 employees, for a total population of 71,541 (including a growth factor of 25 percent for residential population and a growth factor of 10 percent for employees).

Based on the estimated annual frequency of 53 emergency incidents per 1,000 residents and employees in the primary response area served by Fire Stations No. 5, 95, 63 and 62, the Proposed Project, and other related projects, could generate an additional 3,792 emergency incidents annually.<sup>397</sup> This would be equivalent to a 33 percent increase over the existing 11,388 incidents within the primary response area of Stations No. 5, 95, 63, and 62. Therefore, the Proposed Project and the identified related projects would increase the workload of Stations No. 5, 95 63, and 62 with a potential reduction in the level of service to the existing community if there is no corresponding increase in manpower and equipment. Cumulative impacts would be less than significant. If anticipated new facilities are not built and sufficiently staffed, a potentially significant cumulative impact could occur. This conclusion applies the Proposed Project, the Equivalency Program and the construction of the Project's off-site improvements.

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<sup>397</sup> *Multiplying the factor of 53 incidents/1,000 population times the total residential and employee population of 71,541 , 1,000 yields 3,792 incidents.*

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**L. PUBLIC SERVICES**  
**(2) POLICE PROTECTION**

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**1.0 INTRODUCTION**

This section addresses impacts on the Los Angeles Police Department (LAPD) that would arise from increased populations associated with the Proposed Project. The analysis addresses the demand for facilities, equipment and offices. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

**2.0 SETTING**

**2.1 Regulatory Framework**

The Los Angeles Citywide General Plan Framework contains policies and objectives which address the provision of police services in the City of Los Angeles and the LAPD. These policies and objectives deal with insuring adequate service infrastructure as population growth occurs via monitoring of services, supporting the provision of additional police and pursuing additional funding for additional officers.

**2.2 Existing Conditions**

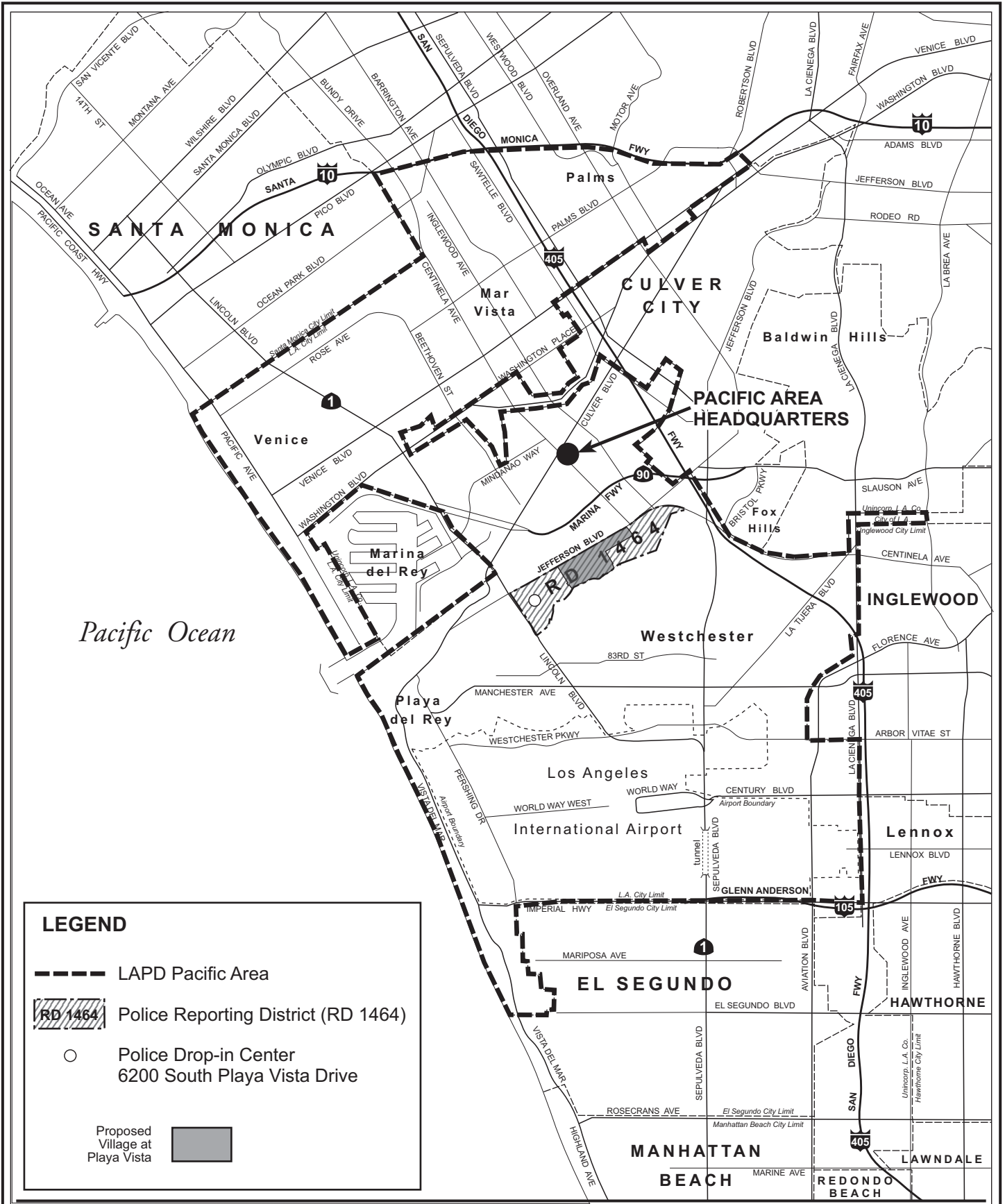
Police protection services are provided throughout the City of Los Angeles by the LAPD, which operates 18 separate administrative geographic areas Citywide. As shown in Figure 88 on page 986, the Proposed Project site is located within the LAPD's 25.62 square mile Pacific Area.<sup>398</sup> The Pacific Area Station is the headquarters for the Pacific Area, and is located at 12312 Culver Boulevard (at Centinela Avenue), approximately 1.6 miles northeast of the Proposed Project site.<sup>399</sup> Eight "Basic Car-Plan" areas for patrol cars are included in the Pacific

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<sup>398</sup> Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 14, 2003.

<sup>399</sup> Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 14, 2003. Also, see LAPD website ([www.lapdonline.org/index.htm](http://www.lapdonline.org/index.htm)).





**LEGEND**

- LAPD Pacific Area
- Police Reporting District (RD 1464)
- Police Drop-in Center  
6200 South Playa Vista Drive
- Proposed Village at Playa Vista



**Figure 88**  
**LAPD Service Boundaries in the Proposed Project Vicinity**

Source: Los Angeles Police Department, 2003

Area. Basic car-plans consist of three teams of officers who are assigned to patrol a neighborhood on a 24-hour basis. Each team works one of the three 8-hour shifts. These officers patrol a neighborhood preventing crime and answering radio calls for service.<sup>400</sup>

The Proposed Project site is located within Car-Plan Area 14A45 (one patrol car with two officers per shift) and Reporting District (RD) 1464.<sup>401</sup> An RD is a smaller geographic unit which is used in gathering and compiling statistical data as well as resource deployment. Response times to calls is one criterion by which the LAPD determines the adequacy of police protection services. The 2002 average response time to emergency calls in the Pacific Area was 9.3 minutes, while the 2002 Citywide average response time to these calls was 10.2 minutes.<sup>402</sup>

Another criterion used as a guide by the LAPD to provide police protection is officer deployment. In 2002, the Pacific Area had a total assignment of approximately 366 sworn officers and 25 civilian support staff deployed over three watches.<sup>403</sup>

Using the number of officers assigned to the Pacific Area and the population of the Pacific Area, the ratio of officers to 1,000 persons located within the Pacific Area can be used as a guide to estimate the level of police services provided. Both residential and employment populations are considered in this estimate since the Proposed Project has residential and employment components. Based on the Pacific Area's current population of about 312,898 residents and employees within the service area, the equivalent of approximately 1.17 officers per 1,000 residents and employees currently serve the Pacific Area.<sup>404</sup>

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<sup>400</sup> Los Angeles Police Department website, February 12, 2003.

<sup>401</sup> Los Angeles Police Department website, March 5, 2003.

<sup>402</sup> Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 14, 2003.

<sup>403</sup> Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 14, 2003.

<sup>404</sup> The estimate is based on 2002 staffing data provided by the LAPD. The total population of 312,898 within the Pacific Area includes 212,576 residents and 100,322 employees. The residential population was provided by the LAPD (Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 7, 2003.) The employment population was estimated by PCR Services Corporation by aggregating census tract information for tracts located within the Pacific Area (tracts that are partly in and partly out were prorated). Employment population is based on SCAG forecasts developed in support of their Regional Transportation Plan (RTP). Data for 2002 were determined by interpolating between the 2000 and 2005 estimates provided by SCAG. Per the LAPD letter, there are 366 sworn officers within the Pacific Area. The ratio of officers to the total population (366 officers for 312,898 citizens) is equivalent to 1.17 officers per 1000 residents and employees.

There were 48 crimes per 1,000 residents committed in the Pacific Area as a whole during 2002. This compares to 49 crimes per 1,000 residents Citywide.<sup>405</sup> The predominant crimes occurring in RD 1464 serving the Project site were aggravated assault (29 percent), grand theft (19 percent), burglary from vehicle (19 percent), and other types of crime (e.g., burglary from residence, street robbery, vehicle theft, etc.) (33 percent).

The LAPD has indicated that the Pacific Area Station facility, built approximately 22 years ago and containing 15,281 “useable” sq.ft. (excluding stairs, hallways, and other non-useable space), is currently operating at capacity.<sup>406</sup> Although this facility is currently operating at capacity, there are no expansion plans for the Pacific Area Station at this time because funding is not available.<sup>407</sup>

The standard response time for emergency calls in the area is approximately 9.3 minutes.

As part of the Playa Vista First Phase Project, a police drop-in center has been incorporated in the design of the Community Center located at 6200 S. Playa Vista Drive. This facility is currently under construction and is anticipated to be complete in mid-2003.

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

Potential impacts upon police services are based on the availability of police officers, equipment, and facilities to support the additional demand created by the populations generated by the Proposed Project. Potential impacts on the need for new officers is based on the existing ratios of officers to population. Both residents and employees are considered in the population base since the Proposed Project includes a mix of residential and office/commercial uses. Based on the Pacific Area’s current population of about 312,898 residents and employees, the equivalent of approximately 1.17 officers per 1,000 residents and employees currently serve the Pacific Area (as described in Subsection 2.2, above). See also Footnote 404 on page 987.

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<sup>405</sup> Booker, Fred, Lieutenant, Officer-in-Charge, Community Relations Section, Los Angeles Police Department. Letter to PCR Services Corporation, dated February 14, 2003.

<sup>406</sup> Capacity for the Pacific Area Station is defined as a facility containing the required number of sworn officers for that division. Hanamaikai, Tanya, Officer Crime Prevention Unit, LAPD. Personal communication February 12, 2003.

<sup>407</sup> Hanamaikai, Tanya, Officer, Crime Prevention Unit, LAPD. Personal communication, February 12, 2003.

### 3.2 Significance Threshold

The Draft Los Angeles CEQA Thresholds Guide (p.J.5-2) states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

Based on these factors, the Proposed Project would have a significant impact on police services, if:

- The demand for police services, based on existing service levels, would be substantially exceeded within the Pacific Area.

### 3.3 Project Design Features

The Proposed Project does not include additional police station facilities nor any other project design features.

### 3.4 Project Impacts

#### 3.4.1 Proposed Project Impacts

The Draft Los Angeles CEQA Thresholds Guide identifies three factors to be used for determining the significance of a project's impacts on police services (see Subsection 3.2, above). The first and third factors are two components that contribute to the significance of a project's impact as they combine to identify a project's demand for City police services. The second factor, which includes this demand, identifies the components of the significance threshold. The second factor also indicates that Project impacts be analyzed at Project buildout relative to the services that would be available at that time. Notwithstanding, the state CEQA

Guidelines indicate that the analyses presented in an EIR reflect the amount of impact relative to existing, rather than future, conditions.<sup>408</sup> Consistent with the direction set forth in the CEQA Guidelines, the analysis of Project impacts presented in this section is based on the impact of the Project relative to existing conditions. Furthermore, an analysis pursuant to the second factor identified above (i.e., Project impacts at Project buildout relative to the police services that would be available at that time) is presented in Subsection 6.0, Cumulative Impacts.

The proposed urban development program within the Village Specific Plan would include new residential and employment population that would generate new demand for police services. The Habitat/Restoration Component of the Proposed Project would not generate a new population and would therefore have no effect on the provision of police services.

As described in Section IV.J, Population, Housing and Employment, the site population generated by the Proposed Project would include approximately 5,720 residents and 1,180 employees. At the current Pacific Area service level of 1.17 officers per 1,000 population, as described above, the population would generate the need for eight new officers (5,720 residents + 1,180 employees = 6,900 total population/1,000 x 1.17 = 8). If the new officers were not provided, the ratio would fall from 1.17 officers per 1,000 population to 1.14 officers per 1,000 population [366 officers ÷ (319,798 population<sup>409</sup>/1,000)].

The Los Angeles Police Department has indicated that the Pacific Area Station facility is currently operating at capacity and there are no expansion plans for the Pacific Area Station at this time because funding is not available.<sup>410</sup> A drop-in facility within the Community Center located at 6200 S. Playa Vista Drive is being provided within the adjacent Playa Vista First Phase project.

The Proposed Project would generate revenues to the City which could be applied toward the provision of new police facilities, with related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers. Since it cannot be guaranteed that the Proposed Project's revenue contributions would be applied to police services, it is conservatively concluded that the Proposed Project's demand may result in a substantial reduction in the service ratio, and impacts prior to mitigation would be significant.

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<sup>408</sup> *California Environmental Quality Act, CEQA Guidelines, Article 9, Section 15125(a).*

<sup>409</sup> *312,898 (current Pacific area population) + 6,900 (population and employees generated by the Proposed Project).*

<sup>410</sup> *Capacity for the Pacific Area Station is defined as a facility containing the required number of sworn officers for that division. Hanamaikai, Tanya, Officer, Crime Prevention Unit, LAPD. Personal communication, February 12, 2003.*

Emergency access to the Project site would be provided by the existing and proposed street systems. City review of street widths, street lighting, and street signage will be based on an evaluation of requirements for the provision of emergency access.

Because of the Proposed Project's size, the Los Angeles Police Department has expressed its concern on accessibility to parking areas for patrol vehicles, lighting issues for nighttime use and provisions for private security throughout the Project site. Mitigation measures have been included below to assure that the Proposed Project has addressed these issues in a manner that is satisfactory to the Police Department.<sup>411</sup>

### **3.4.2 Equivalency Program Impacts**

The preceding police protection analysis addressed impacts associated with the Proposed Project relative to the demand for services and site accessibility.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations. There would be no changes in building locations or site accessibility features. The same Pacific Division station would serve the development.

However, the exchange of office uses to retail and/or assisted living units would alter the site uses, and therefore, the size of the site population. The exchange of office space to retail space has the effect of lowering the number of employees that could occur on the Project site. The exchange of office space to assisted living units increases the number of employees and residents on site. The number of employees associated with the assisted living units is greater than the number of employees associated with the prescribed reduction in office employees. These changes would affect the estimated 8 new officers required to serve the Project site and maintain current service ratios.

As described in Section IV.J, Population, Housing and Employment, the combined number of residents and employees for the Proposed Project is 6,900. As further described there, in Table 107 on page 784, the All Retail Equivalency Scenario has 6,552 residents and employees or 348 less than the Proposed Project. Under this scenario the demand for services would be less than for the Proposed Project. The All Assisted Living Equivalency Scenario and the Retail Plus Assisted Living Equivalency Scenario have 7,134 residents and employees and

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<sup>411</sup> Letter to Heidi Llano, Senior Lead Officer, Los Angeles Police Department, Pacific Division and signed by Wallace Graves, Captain, Commanding Officer, Los Angeles Police Department, Pacific Community Police Station, June 19, 2003.

6,852 residents and employees, respectively. These are increases of 234 and 48. Based on the service ratio of 1.17 officers per 1,000 residents and employees that was used in the above analysis, the number of officers would increase by 0.3 officer under the assisted living scenario, by 0.6 officer under the retail plus assisted living scenario. Therefore, the two scenarios that include assisted living may generate higher demand for police protection services than the Proposed Project; however, this demand translates into an additional increase of 0.3 officer at most.

All of the recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, below) to minimize potential impacts on police protection services would be applicable to the Equivalency Program. As noted above, development under the Equivalency Program would include the same site accessibility and safety features as the Proposed Project. As noted above, the two equivalency scenarios that include assisted living slightly increase the demand for police services. The Equivalency Program would generate revenues to the City which could be applied toward the provision of new police facilities, with related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers. Since it cannot be guaranteed that the Proposed Project's revenue contributions would be applied to police services, it is conservatively concluded that the Proposed Project's demand may result in a substantial reduction in the service ratio, and impacts prior to mitigation would be significant.

### **3.4.3 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These infrastructure improvements would reduce the traffic and water utility impacts of the Proposed Project. They would not add new population to the area, nor would they add new buildings. Therefore, they would not increase the demand for police services, beyond the demand identified in the above analyses. Nonetheless, exclusive of the off-site improvements, the Proposed Project's impacts on police services above are considered significant.

#### 4.0 MITIGATION MEASURES

##### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The following mitigation measures will address impacts on police service level and facilities, as well as the issues pertaining to crime prevention:

- Prior to the issuance of the first building permit, the Applicant shall consult with the Los Angeles Police Department, Pacific Division, regarding site-wide crime prevention features, which may include: provision of call boxes in parks and/or other strategic locations for police and medical emergencies; payphones restricted to outgoing calls only; and “graffiti” cameras in strategic locations to discourage problem graffiti areas from arising.
- Prior to the issuance of each temporary or permanent Certificate of Occupancy, a diagram of the Proposed Project shall be provided to the Pacific Area Commanding Officer which will include access routes, unit numbers (as available), and any additional information that would facilitate police response.
- Prior to the issuance of each building permit, the Applicant shall incorporate crime prevention features pursuant to the Los Angeles Police Department (LAPD) Pacific Division and the LAPD Crime Prevention Unit appropriate to the design of the property involved in the Proposed Project. Those may include the following elements:
  - The incorporation of access for emergency service personnel and vehicles including provision of security access codes for police personnel;
  - Standard security measures for residential and employee access to buildings;
  - Use of video cameras and private security guards to monitor and patrol the project site during project construction and operation;
  - Entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment; and
  - Solid core doors with deadbolt locks to all offices, shops, and hotel units.

#### 5.0 UNAVOIDABLE ADVERSE IMPACTS

The Proposed Project impacts may result in the need for increased staffing for existing police protection facilities and to maintain the City’s police protection services load. In addition



to the new tax revenues from development of the Proposed Project (inclusive of the Equivalency Program) that could be used for the funding of expansion of the police services and facilities, the Applicant will provide resources and improvements required by all statutory regulations. Since it cannot be guaranteed that the Proposed Project's revenue contributions would be applied to police services, it is conservatively concluded that the Proposed Project's demand may result in a substantial reduction in the service ratio, and impacts after mitigation would be potentially significant.

## 6.0 CUMULATIVE IMPACTS

This analysis of cumulative impacts addresses the need for police officers and facilities that would occur with development from the Proposed Project in combination with other anticipated development located in the LAPD's Pacific Area. Of the 96 related projects, related projects 1-7, 10, 24-25, 28, 34-36, 40, 42, 65, 86, 91, and 95 are included within the Pacific Area. Other related projects are outside of this service area.

Table 139 on page 995 summarizes the residential and employment populations associated with the cumulative growth in the service area inclusive of the Proposed Project, related projects, and background growth (25 percent of the related project population for residents, and 10 percent of related population for employees). The number of residents and employees for each of the related projects, individually, is presented in Table 107 on page 784 of Section IV.J, Population, Housing and Employment. Table 140 on page 996 provides a calculation of the number of officers required to serve the cumulative population. As indicated, there would be a cumulative demand for 79 new officers within the service district. If the new officers were not provided, the police service ratio would fall from 1.17 officers per 1,000 population to .96 officers per 1,000 population ( $366 \text{ officers} / (380,457 \text{ population}^{412} / 1,000)$ ). These conclusions are inclusive of the Proposed Project and the Equivalency Program. Construction of the Project's off-site mitigation measures would not contribute to cumulative impacts on police services.

<sup>412</sup>  $312,898$  (current Pacific area population) +  $23,131$  (related project residents in Pacific Service Area) +  $44,428$  (related project employees in Pacific Service Area). (See footnote 404 on page 987 regarding existing population and Table 139 on page 995).

Table 139

**RESIDENTS AND EMPLOYEES IN RELATED PROJECTS  
(PACIFIC SERVICE AREA)**

	<b>Proposed Project</b>	<b>Related Projects<sup>a,b</sup></b>	<b>Background Growth</b>	<b>Total</b>
<b>Residents</b>	<b>5,720</b>	<b>13,929</b>	<b>3,482</b>	<b>23,131<sup>c</sup></b>
<b>Employees</b>				
Office (sq.ft.)	700	30,620	3,062	34,382
Retail (sq.ft.)	400	1,231	123	1,754
Sound Stages (sq.ft.)		665	67	732
Production and Stage Support (sq.ft.)		1,450	145	1,595
Community Serving (sq.ft.)	80	240	24	344
Hotel (sq.ft.)		1,485	149	1,634
Industrial (sq.ft.)		6,578	658	7,236
Restaurant (sq.ft.)		147	15	162
Fast food (sq.ft.)		14	1	15
Gas Station (sq.ft.)		3	0	3
Health Club (sq.ft.)		129	13	142
Mixed-Use (sq.ft.)		206	21	227
MU-Non-residential (sq.ft.)		230	23	253
Parking Structure (Spaces)		6	1	7
Airport and Related Uses		(4,058)	0	(4,058)
<b>Totals Employees</b>	<b>1,180</b>	<b>38,946</b>	<b>4,302</b>	<b>44,428<sup>c</sup></b>

<sup>a</sup> The number of residents and employees for each of the related projects, individually, is presented in Section IV.J, Population, Housing and Employment.

<sup>b</sup> Related Projects consists of residential projects found within the Pacific Service Area: related projects 1-7, 10, 24-25, 28, 34-36, 40, 42, 65, 86, 91 and 95. See Section III.B of the EIR for the entire list of related projects.

<sup>c</sup> The total number of residents and employees is 67,559. Under the Equivalency Program, this number could increase by 234 to a total of 67,793.

Source: PCR Services Corporation.

Each related project will contribute additional tax revenue not accounted for herein from which allocations can be made for commensurate expansion of police services. If such allocations are made by the City Council from such revenues, significant cumulative adverse effect upon police service would be avoided. Since it cannot be guaranteed that the revenue contributions from future development would be applied to police services, it is conservatively concluded that cumulative demand may result in a substantial reduction in the service ratio, and impacts after mitigation would be potentially significant.

**Table 140****OFFICERS REQUIRED TO SERVE CUMULATIVE POPULATION**

	<b>Residents</b>	<b>Employment</b>	<b>Total</b>	<b>Factor</b>	<b>Officers Required</b>
Proposed Project	5,720	1,180	6,900	1.17 officers/1,000 residents and employees	8
Related Projects <sup>a</sup>	13,929	38,946	52,875	1.17 officers/1,000 residents and employees	62
Growth Factor	<u>3,482</u>	<u>4,302</u>	<u>7,784</u>	1.17 officers/1,000 residents and employees	<u>9</u>
<b>Total</b>	<b>23,131</b>	<b>44,428</b>	<b>67,559 <sup>b</sup></b>		<b>79 <sup>b</sup></b>

<sup>a</sup> The number of residents and employees associated with related projects is calculated in Table 139 on page 995. The related projects included in the analysis are taken from the full list of related projects in Section IV.J, Population, Housing and Employment, and includes those projects which are located in the Pacific Area. Projects outside of this service boundary are not included.

<sup>b</sup> Under the Equivalency Program, the cumulative population could increase by 234 to 67,793 requiring an additional third of an officer.

Source: PCR Services Corporation, February 2003.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**L. PUBLIC SERVICES**  
**(3) SCHOOLS**

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**1.0 INTRODUCTION**

This section addresses the potential impact of the Proposed Project on the public schools. The analysis evaluates whether available school capacity is sufficient to accommodate the students generated by the Proposed Project. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Sources**

Information utilized in this section was provided primarily by the Los Angeles Unified School District (LAUSD). Information regarding regulations and funding was obtained through correspondence with members of the LAUSD staff in a number of departments, including: the Developer Fee Program, Governmental Relations, and the Real Estate and Asset Management Branch. Furthermore, the School Fee Justification Studies for Los Angeles Unified School District, prepared in September 2002, was also utilized for information regarding LAUSD funding and developer fee requirements.

Information received from the LAUSD included current legislative conditions, current programming and existing and projected future student populations for the school sites serving the Proposed Project.

**2.2 Regulatory Framework**

**2.2.1 Federal Level**

Education is mostly regulated on the State and Local levels. However, the federal government is involved in providing funding for specialized programs. For example,

approximately 10 to 11 percent of funding for the LAUSD is generated from the federal government.<sup>413</sup> These monies are mandated for specific programs (i.e., school lunches/breakfasts, Title 1, Special Education, School to Work, and Goals 2000), and are not used for general educational purposes. The discussions of state and local level regulations in the following sections provide information on the regulations most directly affecting the provision of education services in the area.

## **2.2.2 State Level**

The LAUSD is subject to the regulations of the California Education Code and governance of the State Board of Education.

### **2.2.2.1 Funding**

#### **State Funding**

Historically, the State has been responsible for passing legislation for the funding of local public schools, as well as providing the majority of monies to fund education in the State. Currently, as part of the State budget, the State funds approximately 85 percent of the cost of education within the LAUSD. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill 2926 (AB 2926) in 1986, allowing school districts to collect impact fees from developers of residential and commercial/industrial building space. Development impact fees were also referenced in the 1987 Leroy Greene Lease-Purchase Act, which required school districts to contribute a matching share of project costs for construction, modernization, or reconstruction. Since the inception of development impact fees, additional state legislation has passed to afford changes to the fees structure and general guidelines, as discussed below.

#### **School Facility Funding**

Current State law permits the LAUSD to impose a fee on new development for the purpose of augmenting school facilities.<sup>414</sup> Payment of the statutory school fee will assist the LAUSD in accommodating increased enrollment via expanded facilities. The Applicant will pay one-time school fees for new residential and commercial uses at the rate in effect at the time of issuance of building permits as required by State law. These fees are currently \$3.55 and \$0.33 per square foot of new residential and commercial development, respectively. In addition,

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<sup>413</sup> *Los Angeles Unified School District, Office of the Chief Financial Officer. Data reflects allocations for fiscal years 1998-99 through 2000-01.*

<sup>414</sup> *California Government Code Section 65995.*

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Proposition 1A was passed by the California voters in 1998 which provided a bond measure for the purposes of augmenting public school facilities. Provided below is an outline of the basic provisions of Proposition 1A:

- A \$9.2 billion bond issuance to provide funding for necessary educational facilities for at least four years to facilitate class size reduction, to relieve overcrowding and accommodate student enrollment growth, to repair older schools and for wiring and cabling for education technology;
- Funds will also be used to upgrade and build new classrooms in community colleges, the California State University, and the University of California;
- These bonds may be used only for eligible construction projects; and
- Appropriates General Fund monies to pay off the bonds.

One additional provision of Proposition 1A is the concurrent implementation of Senate Bill 50 (SB 50). This specific provision of SB50 has been codified in California Government Code Section 65995(h) which states, “[T]he payment of a fee ... pursuant to Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of ... development of real property.”

### **2.2.2.2 Classroom Size**

In addition to funding, the State is also involved in deciding the structure of local schools. For instance, in August 1996, the State Senate passed SB 1777 (1996-1997 Class Size Reduction Program) and SB 1789 (Class Size Reduction Facilities Funding Program). These programs together provide incentive monies to the local school districts to lower class size for grades K-3 to a ratio of 20:1 (students: teachers) and provide funds for additional teaching stations.

### **2.2.2.3 Interdistrict Transfers Regulation**

According to state law (AB 149 and AB 2071), parents may elect to enroll their children in public school districts whose boundaries encompass the parent’s place of work, rather than the parent’s place of residence, and for the school district to consider such applications.<sup>415</sup> The interdistrict transfer program applies to kindergarten through middle school (i.e., grades K-8) students. “Sending” and “receiving” school districts may refuse interdistrict transfers; however,

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<sup>415</sup> *David Taussig and Associates, Inc., School Fee Justification Studies for Los Angeles Unified School District, Los Angeles Unified School District, September 2002.*

grounds for such refusals include findings that the requested transfer would be to a school district that is operating at full capacity, would negatively impact a district's desegregation plan or that the additional cost of educating a student would exceed the amount of additional state aid received as a result of the transfer.<sup>416</sup> Districts cannot arbitrarily refuse transfers (e.g., on the basis of race, ethnicity, sex, parental income or scholastic achievement).<sup>417</sup>

According to the LAUSD, the number of transfers from the LAUSD to other school Districts is greater than the number of transfers into the District.<sup>418</sup> The most prevalent inter-district transfer situation occurs among students whose families live within the boundaries of the District, and adjacent to another school district which offers what the family believes to be a higher quality of education.

### **2.2.3 Regional/County Level**

The LAUSD's operations are predominantly funded by local property tax revenue that is first accrued in a common statewide pool with similar property tax revenue throughout the state, then allocated to each school district on the basis of average daily attendance. In addition, state law also permits school districts to charge development fees to fund capital acquisition and improvements to school facilities, based on documented justification that residential and non-residential development projects generate students. The LAUSD School Fee Justification Studies, published in 2002, provides the justification relative to the LAUSD and allows imposition of fees. These fees may be adjusted periodically. Effective October 23, 2002, the adopted Developer Fees are as follows: \$3.55 per square foot for residential construction, \$0.33 per square foot for commercial/industrial construction, \$0.27 per square foot for self-storage construction, and \$0.09 per square foot for parking construction.

### **2.2.4 Local Level**

As stated above, the State is primarily responsible for the funding and structure of the local school districts. As the LAUSD provides education to students in many cities and county areas, in addition to the City of Los Angeles, its oversight is largely a regional/county level issue. However, public schools operate under the policy direction of elected governing district school boards (elected from the local area) as well as local propositions which directly impact the funding of facility construction and maintenance. In 1997, Proposition BB (a \$2.4 billion bond act) passed, which authorizes the LAUSD to provide funding for the repair and construction of

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<sup>416</sup> *California Education Code Section 48204 (f).*

<sup>417</sup> *Ibid.*

<sup>418</sup> *Telephone conversation with Joan Friedman, Los Angeles Unified School District, August 24, 2000.*

school facilities throughout the LAUSD. Funds received from the sale of the bonds are being used at more than 800 school sites throughout the LAUSD to repair safety hazards such as obsolete wiring and plumbing, decaying walls and drainage systems and leaking roofs, to bring schools into compliance with current earthquake standards, to remove asbestos and lead paints from classrooms, to provide computer technology in classrooms and libraries, to provide air conditioning in classrooms, to upgrade school security with metal detectors, lighting, fences and other security systems, to make schools accessible to the disabled, and to construct new classrooms including the addition of factory-built classrooms to decrease class size. No money from the sale of the bonds can be used for administrators' salaries.

## 2.3 Existing Conditions

### 2.3.1 Regional Context

The LAUSD is one of the largest public school districts in the nation. It is located in Los Angeles County and serves the City of Los Angeles, all or portions of 24 other cities in the County, and numerous unincorporated areas of the County which surround the City of Los Angeles.<sup>419</sup> The district covers an area of over 700 square miles, with an estimated population of almost 5.3 million people residing in over 1.7 million households (approximately 77.0 percent of these households are also within the boundaries of the City of Los Angeles). The LAUSD provides kindergarten through high school (K-12) education to a total of 736,675 students (the number of students generated includes students who are enrolled in special education programs administered by the LAUSD), enrolled in approximately 550 elementary, middle and senior high schools. In addition, LAUSD also operates approximately 400 additional schools and centers.

The student generation rate (SGR) is the average number of students enrolled in public schools per household, and represents a general relationship between overall student enrollment and the total amount of housing in the District. Between 2002 and 2020, the LAUSD projects an additional 50,182 students will be residing in 124,710 additional future residential units within the district's boundaries. The 2002 Residential Development School Fee Justification Study calculated SGRs by housing type; single-family detached and multi-family attached for each school level. The number of future residential units to be constructed in the District was based on the complementary Residential Market Report prepared by David Taussig & Associates.<sup>420</sup> The SGRs for single-family detached units include 0.22 elementary school (K-5) student per

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<sup>419</sup> David Taussig and Associates, Inc., *School Fee Justification Studies for Los Angeles Unified School District, Los Angeles Unified School District, September 2002.*

<sup>420</sup> David Taussig and Associates, Inc., *Residential Development Market Report for Los Angeles School District, August 2002.*



dwelling unit, 0.11 middle school (6-8) student per dwelling unit, and 0.11 senior high (9-12) student per dwelling unit.<sup>416</sup> The SGRs for multi-family attached units include 0.21 elementary school (K-5) student per dwelling unit, 0.10 middle school (6-8) student per dwelling unit, and 0.09 senior high (9-12) student per dwelling unit.<sup>421</sup>

### 2.3.2 Site Conditions

The Project site is located within the attendance boundaries of three public schools, including one elementary, one middle, and one senior high school, as shown on Table 141 on page 1003. With the exception of K-3 classes, which are limited to 20 students, the standard classroom sizes for schools currently serving the Project site range from 22 to 33 students per classroom.<sup>422</sup> As shown in Table 141, the schools in the vicinity of the Proposed Project site have an existing surplus capacity for 76 elementary school students, 145 middle school students, and 25 senior high students.<sup>423</sup>

A number of other schools are located in proximity of the Proposed Project site and could serve Project students via adjustments to the enrollment boundaries of the individual schools. School names, locations and attendance boundaries for these facilities are shown in Figure 89 through Figure 91 on pages 1004 through 1006, respectively. These schools currently operate according to the Los Angeles Educational Alliance Reform Now (LEARN) calendar, which is a modification of the traditional school year. The modifications include longer breaks occurring during the month of December and in the Spring along with a shorter summer break, with the calendar remaining as a single-track program.

### 2.3.3 Surrounding Off-Site Conditions

The LAUSD serves the majority of the students generated in the City of Los Angeles. In addition, eight nearby cities (Cudahy, Gardena, Huntington Park, Lomita, Maywood, San Fernando, Vernon, and West Hollywood) are completely serviced by the LAUSD; as well as portions of 17 other cities (Bell, Bell Gardens, Beverly Hills, Carson, City of Commerce, Downey, El Segundo, Hawthorne, Inglewood, Long Beach, Lynwood, Monterey Park, Montebello, Rancho Palos Verdes, Santa Monica, South Gate and Torrance) and portions of unincorporated Los Angeles County.<sup>424</sup> The majority of communities surrounding the Project site are serviced by the LAUSD. However, a number of communities surrounding the Project site

<sup>421</sup> David Taussig and Associates, Inc., *School Fee Justification Studies for Los Angeles School District, Los Angeles Unified School District, September 2002.*

<sup>422</sup> Los Angeles Unified School District School Information Branch, *School Accountability Report Card website.*

<sup>423</sup> Ray Dippel, *Los Angeles Unified School District Office of Environmental Health and Safety, March 2002.*

<sup>424</sup> LAUSD *Fingertip Facts, 2002-2003.*

Table 141

**SCHOOL CAPACITY FOR FACILITIES SERVING  
THE PLAYA VISTA SECOND PHASE PROJECT SITE**

<b>Schools</b>	<b>Grades</b>	<b>Operating Capacity</b>	<b>2001-2002 Actual Enrollment</b>	<b>2001-2002 Unutilized Capacity</b>
<b>Elementary School</b>				
Playa del Rey	K-5	311	235	76
<b>Middle School</b>				
Marina del Rey <sup>a</sup>	6-8	1,549	1,404	145
<b>Senior High School</b>				
Venice <sup>a</sup>	9-12	3,033	3,008	25

<sup>a</sup> Includes magnet school enrollment.

Source: Ray Dippel, Los Angeles Unified School District Office of Environmental Health and Safety, March 2002.

are also located within other school districts, such as the Culver City Unified School District, El Segundo Unified School District, Inglewood Unified School District, Centinela Valley Union High School District, Hawthorne School District, Wiseburn School District and the Santa Monica Municipal School District. Each of these districts are responsible for similar services as the LAUSD and are subject to the same student enrollment regulations. Furthermore, each of these districts require similar development impact fees for the construction of school facilities.

LAUSD has experienced an increase in enrollment over the last seven years. Total enrollment has increased from 636,000 students in the 1994-1995 school year to over 736,000 students in the 2000-2001 school year, an increase of almost 16 percent in seven years. Further, LAUSD has recently implemented a Class Size Reduction program. As part of an effort to create the needed additional space, the District has implemented multitrack, year-round school calendars at many school sites. As of the 2002-2003 school year, more than 200 LAUSD schools are on multitrack year-round schedules to accommodate the heavy enrollment at these facilities.<sup>425</sup> Transportation of students from overcrowded schools to less crowded schools is one option available to the school district to deal with overcrowding (by policy, considered the last option). Other options available to the District include open enrollment and providing portable classrooms and new permanent facilities. Therefore, the LAUSD currently has a few options to address overcrowding. While overcrowding is a general concern for the LAUSD, the schools which serve the Project area are operating at enrollment levels which are below capacity.

<sup>425</sup> David Taussig and Associates, Inc., Residential Development Market Report for Los Angeles School District, August 2002.

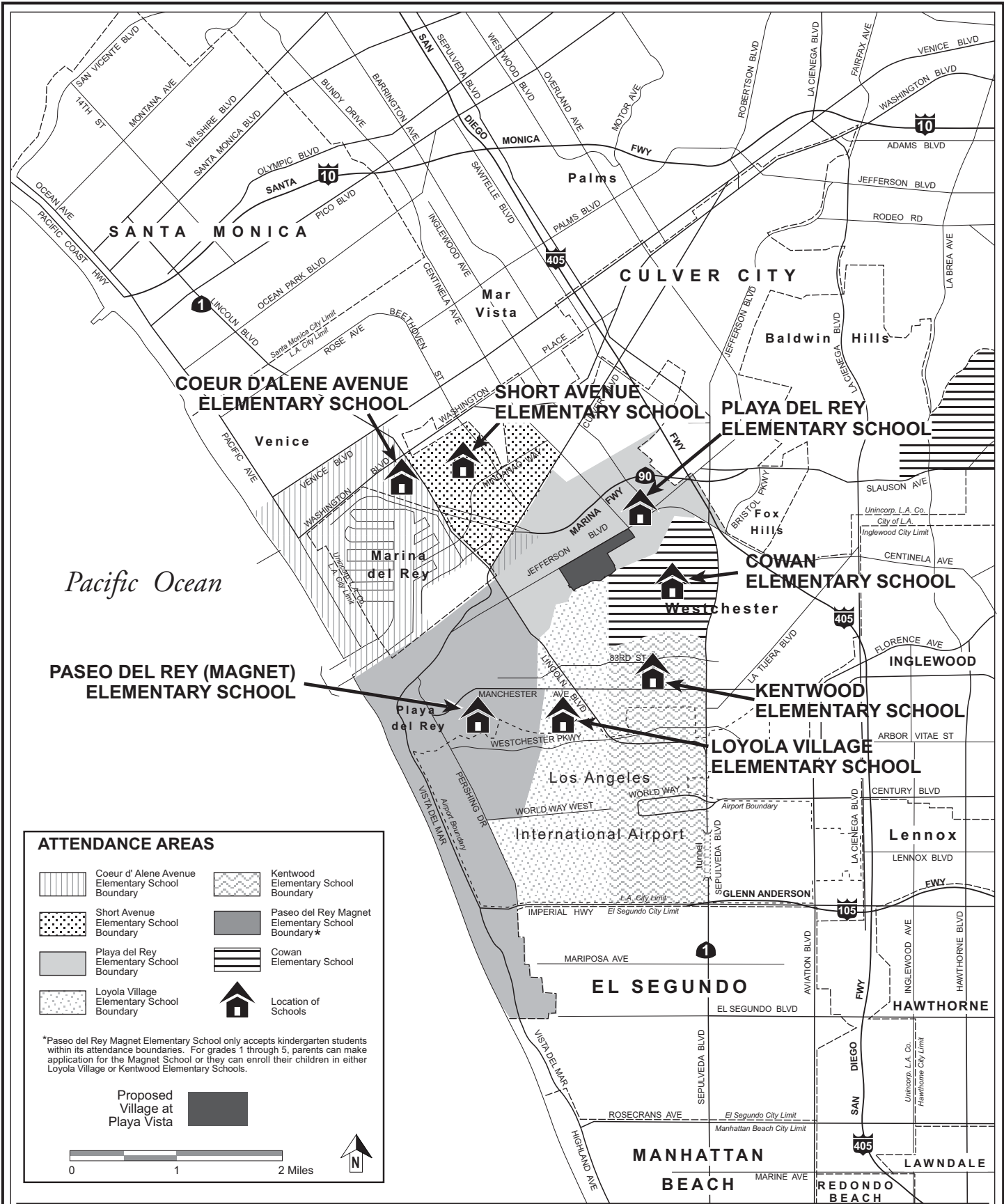


Figure 89  
Public Elementary Schools in the  
Proposed Project Vicinity

Source: Los Angeles Unified School District, 1996

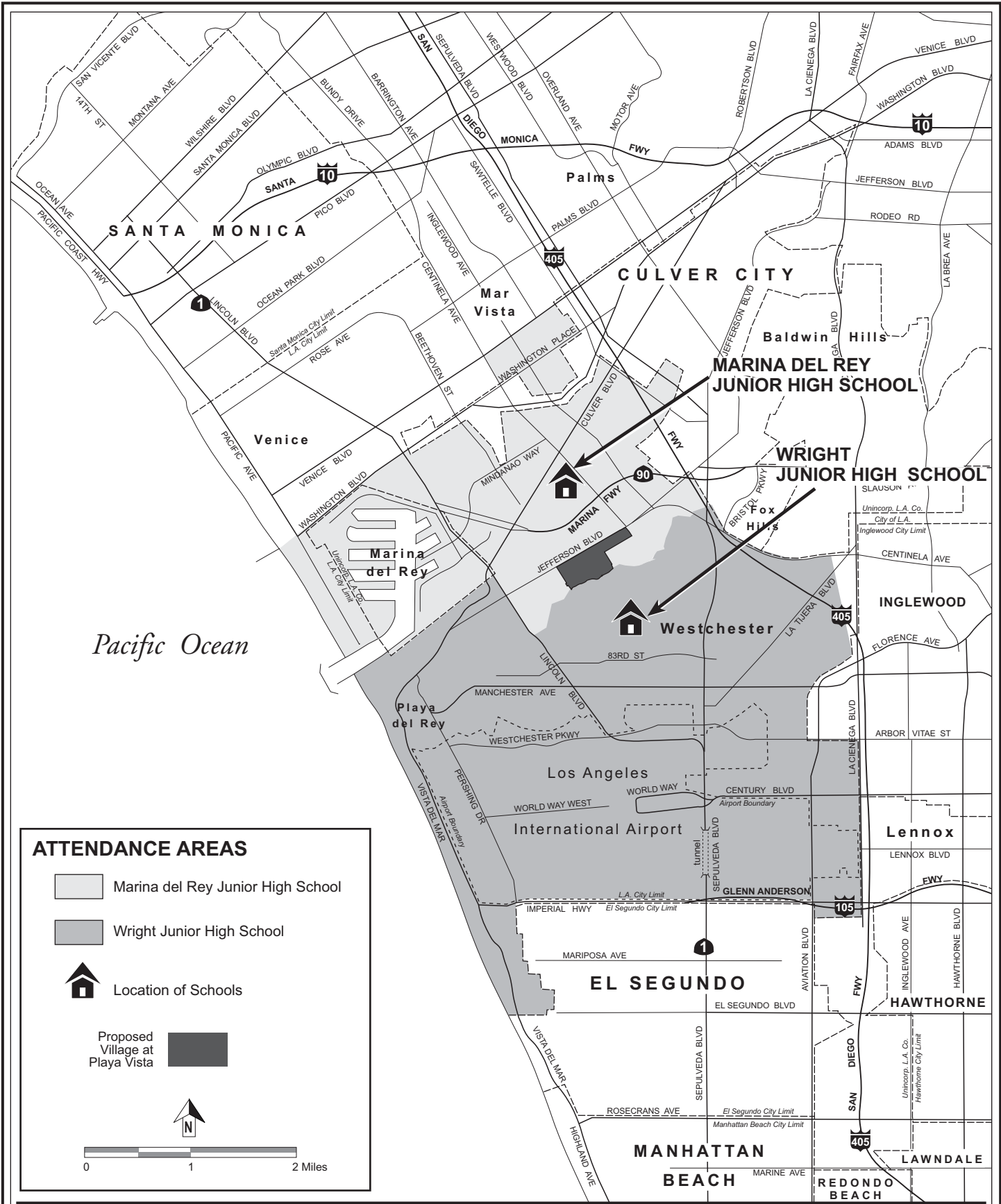


Figure 90  
Public Junior High Schools in the  
Proposed Project Vicinity

Source: Los Angeles Unified School District, 1996

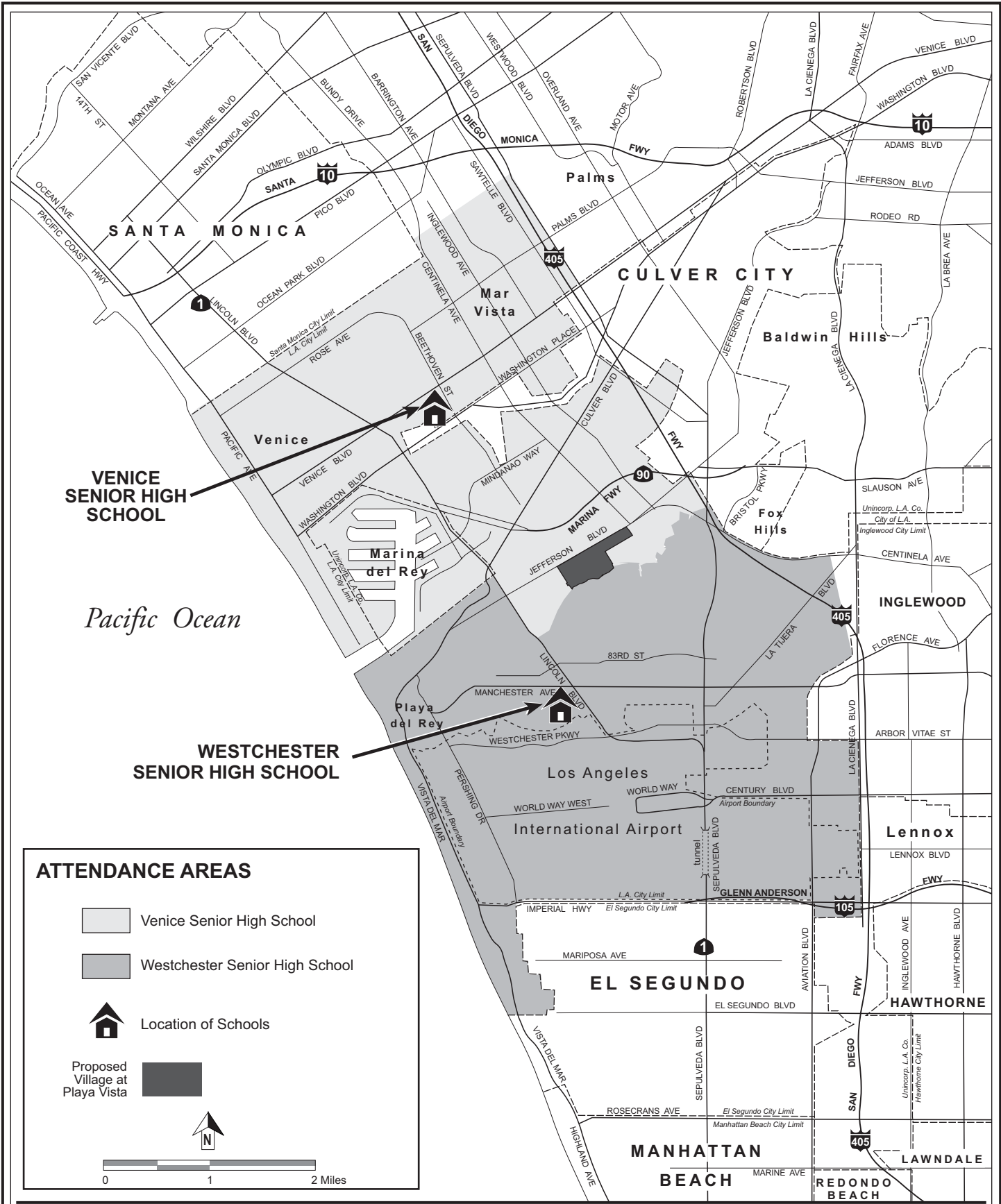


Figure 91  
Public High Schools in the  
Proposed Project Vicinity

Source: Los Angeles Unified School District, 1996



### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

Utilizing information supplied by the LAUSD, the existing conditions of the public schools serving the Project area were assessed. This assessment addresses the potential impacts of the Project on the public school system only, as it is directly responsible (and mandated) to service new student populations generated from implementation of the Proposed Project. Private institutions, as well as higher education institutions, are not evaluated since they are privately funded and not mandated to provide services. Therefore, these schools are not discussed herein.

The methodology used in this analysis assumes that the numbers of new students generated from the Proposed Project are directly and indirectly related to the type and amount of proposed residential and commercial construction. Modeling assumptions and the logic used by the LAUSD were incorporated into a model that forecasts student generation based on the unique characteristics of the Proposed Project. This methodology, the Playa Vista Student Generation Model,<sup>426</sup> supplements LAUSD's methodological assumptions to make them consistent with the projected demographic and housing mix anticipated for the Proposed Project.

In order to model the relationships and forecast the number of students generated by the Project, separate models were developed to individually predict student generation from residential as well as from commercial development. To forecast student generation related to residential development, the Integrated Multivariate Household (IMH) model was developed. The IMH model incorporates a number of critical indicator variables, including but not limited to, housing tenure and type, housing value, and the overall size of the housing units, to develop a student generation forecast which more accurately reflects future conditions.

With respect to commercial development, the basic calculation methodology employed by the LAUSD was used in the Playa Vista Student Generation Model. However, the LAUSD methodology has been modified and refined to more accurately reflect the characteristics of the Proposed Project versus LAUSD's district-wide assumptions. Among the assumptions used to estimate the number of public school students generated by commercial development are the following: (1) the percentage of employees who would live outside of the LAUSD; (2) the average numbers of workers per household; and (3) the number of new workers who will work as well as reside within the Proposed Project. The resulting Enhanced Employment (EE) model was then applied to forecast student generation from commercial development. The Playa Vista Student Generation Model is detailed in Appendix L.

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<sup>426</sup> RPM Consulting, *Student Generation Study, Playa Vista Development, July 2003.*

Students generated from the Proposed Project were compared to LAUSD's forecasted available capacity for the relevant schools to ascertain impacts. Thus, the analysis of potential Project impacts on school facilities is based on the amount of Project development occurring within the attendance boundaries of each school. In cases where existing capacity appears to be inadequate for Project-generated students, the analysis includes an evaluation of the sufficiency of the school sites for the addition of new classroom capacity to accommodate Project-generated students.

The Draft Los Angeles CEQA Thresholds Guide provides information regarding student generation factors (p. J.3-50) and current school capacity (p. J.3-12-50). The student generation factors presented in this document are a reproduction of the LAUSD factors in effect in 1998, the date the Draft Los Angeles CEQA Thresholds Guide was published. As these factors were developed by the LAUSD, they were incorporated, as described above, into the development of the Playa Vista Student Generation Model. Refer to Appendix L of the Draft EIR for additional technical information regarding the quantitative relationship between the Playa Vista Student Generation Model and these LAUSD student generation factors. With regard to school capacity, the analysis, as described in Subsection 2.3.2, above, utilizes 2002 school capacity data obtained directly from the LAUSD. Thus, it is more current, and thus, more valid for analysis than the 1998 information presented in the Draft Los Angeles CEQA Thresholds Guide.

### **3.2 Significance Thresholds**

The Draft Los Angeles CEQA Thresholds Guide (p. J.3-2) states that the determination of the significance of school impacts shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to demand;
- Whether and the degree to which accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and

- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Based on these factors, the Proposed Project would have a significant impact on school capacity and facilities, if:

- The number of LAUSD students generated by the Project would exceed the capacity of the LAUSD schools which serve the Project site, thereby requiring the construction of new facilities, and/or modifications to the existing operational characteristics of the school (e.g., a major reorganization of students or classrooms, major revisions to the school calendar, or other actions which would create a temporary or permanent impact on the school(s)). School capacity is defined as the number of students that can be accommodated at a school based on existing facilities.

### **3.3 Project Design Features**

The Proposed Project does not include the development of public school facilities on the Project site. As such, no project design features are proposed by the Applicant relative to public school facilities.

### **3.4 Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies four factors to be used for determining the significance of a project's impacts on school facilities (see Subsection 3.2, above). The first and fourth factors are two components that contribute to the significance of a project's impact as they combine to identify a project's demand for public school facilities. The second and third factors, which includes this demand, identifies the components of the significance threshold. The second factor also indicates that Project impacts be analyzed at Project buildout relative to the public school facilities that would be available at that time. Project impacts are assessed in terms of LAUSD's forecast of future enrollment levels. LAUSD forecasts student enrollment on a rolling five-year basis, with the latest available forecast being for the 2006-2007 school year. This 2006-2007 forecast is used for analyzing impacts at Project buildout (as set forth in the second factor) as it represents the LAUSD's forecast closest to the Project's 2010 buildout year.



### **3.4.1 Students Generated by the Proposed Project**

The Playa Vista Student Generation Model forecasts that the Proposed Project would generate a total of 616 students, distributed as follows: 304 elementary students, 145 junior high school students and 167 high school students. Table 142 on pages 1011 to 1012 provides the Project's detailed student generation forecast. The Habitat Creation/Restoration Component of the Proposed Project would not generate any new population and would therefore have no effect on the provision of school services.

### **3.4.2 Proposed Project Impacts on LAUSD Schools**

A summary of the existing capacity at the LAUSD schools serving the Proposed Project, as well as the additional capacity which can be realized through the addition of new classrooms at these schools, is presented in Table 143 on page 1012. The analysis of potential Project impacts on the LAUSD elementary, junior high and high schools serving the Project site is presented in Table 144 on page 1013 and discussed under separate subheadings below.

#### **3.4.2.1 Elementary Schools**

The Proposed Project is located within the attendance boundaries of Playa del Rey Elementary School. Proposed Project elementary school enrollment would exceed the forecasted unused capacity at this school by 257 students. Accommodating these additional students would require the construction of new facilities and/or modifications to the existing operational characteristics of the school (e.g., major reorganization of students or classrooms, major revisions to the school calendar, etc.). As such, Project development would result in a significant impact. With the addition of the new classrooms that can be accommodated at Playa del Rey Elementary School, sufficient capacity would be available at this school to accommodate the elementary school students generated by the Proposed Project. Should additional new classrooms be constructed at Playa del Rey Elementary School, and the Playa Vista Elementary School accommodates a portion of the Project's students, Playa del Rey Elementary School would operate with a surplus capacity of 55 students, as shown in Table 144 on page 1013.

As the Project's demand for elementary school facilities could only be met via the construction of Playa Vista Elementary School, new classroom facilities at Playa del Rey Elementary School, and/or modifications to the existing operational characteristics of the school (e.g., major reorganization of students or classrooms, major revisions to the school calendar, etc.), it is conservatively concluded that development of the Proposed Project would have a significant impact on elementary school capacity. However, with the payment of one-time school fees by the developer, Proposed Project impacts, pursuant to the provisions of SB 50, would be fully mitigated.

Table 142

**FORECAST OF LAUSD STUDENTS GENERATED BY  
THE PROPOSED PROJECT**

**A. Residential Development**<sup>a, b</sup>

<u>Type of Residential Unit</u>	<u>Number of Residential Units</u>	<u>Elementary School</u>		<u>Junior High School</u>		<u>High School</u>	
		<u>Factor</u>	<u>Students</u>	<u>Factor</u>	<u>Students</u>	<u>Factor</u>	<u>Students</u>
<b><u>Owner Occupied</u></b>							
One Bedroom	320	0.144	47	0.041	13	0.061	20
Two Bedroom	756	0.052	40	0.031	23	0.038	29
Three Bedroom	572	0.109	62	0.062	35	0.068	39
Four Bedroom	34	0.068	2	0.061	2	0.174	6
<b>Subtotal</b>	<b>1,682</b>		<b>151</b>		<b>73</b>		<b>94</b>
<b><u>Renter Occupied</u></b>							
Studio	143	0.062	9	0.029	4	0.029	4
One Bedroom	380	0.113	43	0.049	19	0.046	17
Two Bedroom	336	0.160	54	0.076	26	0.082	28
Three Bedroom	59	0.265	16	0.156	9	0.174	10
<b>Subtotal</b>	<b>918</b>		<b>122</b>		<b>58</b>		<b>59</b>
<b><u>Total Units</u></b>							
Studio	143		9		4		4
One Bedroom	700		90		32		37
Two Bedroom	1092		94		49		57
Three Bedroom	631		78		44		49
Four Bedroom	34		2		2		6
<b>Subtotal</b>	<b>2,600</b>		<b>273</b>		<b>131</b>		<b>153</b>

**B. Commercial Development**

<u>Uses</u>	<u>Amount of Proposed Development</u>	<u>Employee Density Factor</u> <sup>c</sup>	<u>Forecasted Employment</u>
Office (sq.ft.)	175,000	250	700
Retail (sq.ft.)	150,000	375	400
Community-Serving (sq.ft.)	40,000	500	80
<b>Total Employees</b>			<b>1,180</b>

<u>Estimated Student Generation</u> <sup>a</sup>	<u>Elementary School</u>		<u>Junior High School</u>		<u>High School</u>	
	<u>Factor</u>	<u>Students</u>	<u>Factor</u>	<u>Students</u>	<u>Factor</u>	<u>Students</u>
1,180 Employees	0.026	31	0.012	14	0.012	14

Table 142 (Continued)

**FORECAST OF LAUSD STUDENTS GENERATED BY  
THE PROPOSED PROJECT**

**C. Total Public Student Generation**

<u>Grade Level</u>	<u>Students Generated by Residential Development</u>	<u>Students Generated by Commercial Development</u>	<u>Total Students</u>
Elementary School (K-5)	273	31	304
Junior High School (6-8)	131	14	145
High School (9-12)	<u>153</u>	<u>14</u>	<u>167</u>
<b>Total Estimated Students</b>	<b>557</b>	<b>59</b>	<b>616</b>

<sup>a</sup> Student generation rates are those developed for the Proposed Project as presented in the Playa Vista Student Generation Study, RPM Consulting, August 6, 2003(see Appendix L of the Draft EIR).

<sup>b</sup> Student generation rates for the entire Project have been adjusted to correspond to the Districtwide average of 51.1 percent of all students in grades 6-12 and 48.9 percent of all students in grades kindergarten-5 (K-5), LAUSD Fingertip Facts, 2002-2003.

<sup>c</sup> Factors generated by LAUSD and PCR Services Corporation from the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition, 1997.

Source: PCR Services Corporation based on the Playa Vista Student Generation Study, RPM Consulting, July 2003.

Table 143

**EXISTING CAPACITY AND ADDITIONAL CAPACITY PROVIDED BY NEW  
CLASSROOMS AT LAUSD SCHOOLS SERVING THE PROPOSED PROJECT**

<u>School</u>	<u>Existing Enrollment Capacity<sup>a</sup></u>	<u>Space for New Classrooms<sup>b</sup></u>	<u>New Classroom Capacity<sup>c</sup></u>	<u>Potential Increase in Enrollment Capacity</u>	<u>Percent Increase in Capacity from New Classrooms</u>
<b><u>Elementary School</u></b>					
Playa del Rey	311	12	300	611	96%
Playa Vista	<u>600</u>	<u>0</u>	<u>N/A</u>	<u>12<sup>d</sup></u>	<u>0%</u>
<b>Subtotal</b>	<b>911</b>	<b>12</b>	<b>300</b>	<b>623</b>	<b>33%</b>
<b><u>Junior High School</u></b>					
Marina del Rey	1,549	44	1,320	2,869	85%
<b><u>High School</u></b>					
Venice	3,033	0	0	3,033	0%

<sup>a</sup> Ray Dippel, Los Angeles Unified School District, March 2002.

<sup>b</sup> Ray Dippel, Los Angeles Unified School District January 2001.

<sup>c</sup> Assumes an average 25 students per new classroom for elementary schools and 30 students per new classroom for junior high and senior high schools.

<sup>d</sup> The First Phase Playa Vista Elementary School will generate 588 elementary school students (see Table 145 on pages 1017 and 1018).

Source: PCR Services Corporation, July 2003.

Table 144

## PROPOSED PROJECT IMPACTS ON LAUSD SCHOOL FACILITIES

	Playa del Rey Elementary School (K-5)	Marina del Rey Middle School (6-8)	Venice High School (9-12)
<b>Current and Projected Conditions</b>			
Operating Capacity <sup>a</sup>	311	1,549	3,033
2001-2002 Enrollment <sup>a</sup>	235	1,404	3,008
2001-2002 Unutilized Capacity	76	145	25
2006-2007 Projected Enrollment <sup>a</sup>	264	1,067	2,259
2001-2002 to 2006-2007 Projected Growth in Enrollment	29	(337)	(749)
2006-2007 Projected Unutilized Capacity	47	482	774
<b>Future Conditions with Existing Facilities</b>			
Project Generated Students	304	145	167
<b>Projected Surplus/Deficit</b>			
Without Playa Vista School	(257)	337	607
With Playa Vista School <sup>b</sup>	(245)	N/A	N/A
<b>Future Conditions with Expanded Facilities (Existing Facilities + New Classrooms)</b>			
Maximum Students in Existing Facilities and New Classrooms <sup>c</sup>	300	1,320	0
Total Capacity with New Classrooms <sup>d</sup>	611	2,869	3,033
2006-2007 Projected Unutilized Capacity With New Classrooms <sup>c</sup>	347	1,802	774
Project Generated Students	304	145	167
<b>Projected Surplus/(Deficit) With New Classrooms</b>			
Without Playa Vista School	43	1,657	607
With Playa Vista School	55	N/A	N/A

<sup>a</sup> Ray Dippel, Los Angeles Unified School District Office of Environmental Health and Safety, March 2002. LAUSD uses five-year resident enrollment projections for schools, with the most recent enrollment projection being for 2001-2002 through 2006-2007. Based on these projections, future enrollments at Marina del Rey Middle School and Venice High School are forecasted to decline relative to the 2001-2002 enrollment forecast.

<sup>b</sup> Included as part of the First Phase Playa Vista Project. For planning purposes, it is assumed that the Playa Vista elementary school will be open during the development of the Proposed Project and will have a capacity of 600 students.

<sup>c</sup> Based on the maximum number of new classrooms which can be accommodated at the school site multiplied by an average classroom size (i.e., number of students) of 25 for elementary schools and 30 for junior high and senior high schools. The maximum number of new classrooms at a school site is determined by the Rodriguez Consent Decree (1992) which limits the District's construction of new classrooms based on the availability of playground area. (Ray Dippel, Los Angeles Unified School District, March 2002).

<sup>d</sup> Calculated based on the addition of Operating Capacity and Maximum Students in New Classrooms.

<sup>e</sup> Calculated based on subtracting 2006-2007 Projected Enrollment from Total Capacity with New Classrooms.

Source: PCR Services Corporation, July 2003.

### 3.4.2.2 Middle Schools

The Proposed Project is located within the attendance boundaries of Marina del Rey Middle School. Middle school enrollment attributable to the Proposed Project would be within

the forecasted unused capacity of Marina del Rey Middle School. With the development of the Proposed Project, the forecasted unused capacity of Marina del Rey Middle School would be reduced from 482 to 337 students. This constitutes a less-than-significant impact. Furthermore, additional capacity for 1,320 students could occur at Marina del Rey Middle School with the addition of new classrooms. Project impacts on middle school facilities are, therefore, concluded to be less than significant, as sufficient capacity would be available to accommodate Project generated students without the construction of new school facilities, and/or modifications to the existing operational characteristics of Marina del Rey Middle School.

### **3.4.2.3 High Schools**

The Proposed Project is located within the attendance boundaries of Venice High School. High school enrollment attributable to the Proposed Project would be within the forecasted unused capacity of Venice High School. With the development of the Proposed Project, the forecasted unused capacity of Venice High School would be reduced from 774 to 607 students. This constitutes a less-than-significant impact, as sufficient capacity would be available to accommodate Project generated students without the construction of new school facilities, and/or modifications to the existing operational characteristics of Venice High School.

## **3.5 Equivalency Program**

The preceding analysis of the Proposed Project's impact on public schools addressed whether available school capacity is available to accommodate the students generated by the Project's new residents and employees. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site.

Furthermore, the number of public school students generated by the future on-site residents under all Equivalency Scenarios would be the same as those generated by the Proposed Project for the following two reasons: (1) the assisted living units would not generate any public school students due to the age of the residents; and (2) the amount of residential development under all of the Equivalency Scenarios is the same as the Proposed Project. As shown in Section IV.J., Population, Housing and Employment, all of the Equivalency Scenarios would generate fewer on-site employees than the Proposed Project. As employment is lower, the number of public school students generated by the on-site employees under all Equivalency Scenarios would be less than that generated by the Proposed Project. Based on the above, the

number of public school students generated under all Equivalency Scenarios would be less than those generated by the Proposed Project. While the Equivalency Scenarios would generate fewer public school students, the differences in student generation are not sufficient to alter the impacts identified above.

As such, Equivalency Program development, as is the case with the Proposed Project, would result in a significant impact on the available capacity at Playa del Rey Elementary School. This impact could be reduced to a less-than-significant level with the construction of new classroom facilities at Playa del Rey Elementary School and/or modifications to the existing operational characteristics of the school (e.g., reorganization of students, classrooms or school calendar, etc.). As these possibilities cannot be assured it is conservatively concluded that development of any Equivalency Scenario would have a significant impact on elementary school capacity. However, with the payment of one-time school fees by the developer, Proposed Project and Equivalency Program impacts, pursuant to the provisions of SB 50, would be fully mitigated.

With regard to middle and high schools, development under the Equivalency Program, as is the case with the Proposed Project, would result in a less-than-significant impact on middle schools. Furthermore, the payment of one-time school fees by the developer, pursuant to the provisions of SB50, would fully mitigate all impacts of the Proposed Project, including those associated with the Equivalency Program.

### **3.6 Off-Site Mitigation Measures**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These infrastructure improvements would reduce the traffic and water utility impacts of the Proposed Project. They would not add new residential population or employment to the area. Therefore, they would not increase the demand for school services, beyond the demand identified in the above analyses. Implementation of the off-site measures would have no impact on schools.

## **4.0 MITIGATION MEASURES**

Under the provisions of SB 50, a project's impacts on school facilities are fully mitigated via the payment of the requisite new school construction fees established pursuant to

Government Code Section 65995. Since the Applicant is required to pay these fees at the time of building permit issuance, impacts of the Project, inclusive of the Equivalency Program, would be fully mitigated. Therefore, no mitigation measures are required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements. Implementation of the off-site measures would have no impact on schools.

## **5.0 UNAVOIDABLE ADVERSE IMPACTS**

As future development will comply with the provisions of Government Code Section 65995, development of the Proposed Project, inclusive of the Equivalency Program, and the identified off-site improvements would not result in any adverse impact.

## **6.0 CUMULATIVE IMPACTS**

Ninety-six projects have been identified as having the potential to occur concurrent with the development of the Proposed Project (i.e., related projects). In analyzing the cumulative impacts related to schools, only those projects within the enrollment districts of the area's schools that would have the potential to cause a cumulative impact are analyzed. Of the 96 identified projects, as shown in Section III.B, Identification of Related Projects, of the EIR, one project (number 40) is within the elementary school boundary, five projects (numbered 1, 2, 7, 37, and 40) are within the junior high school boundary and six projects (numbered 1, 2, 7, 37, 40, and 91) are within the high school boundary. The discussion of potential impacts of cumulative growth involves all applicable off-site related projects along with the development of the Proposed Project. This analysis also addresses the impacts of the Proposed Equivalency Program and the proposed off-site improvements, as Project impacts are greater than those of all Equivalency Program development scenarios, and the off-site improvements to not impact school enrollment.

The assessment of cumulative impacts uses the student generation rates provided by the Playa Vista Student Generation Model for the assessment of student generation attributable to the Proposed Project as well as for the Playa Vista First Phase Project.<sup>427</sup> The forecast of students generated by the adjacent Playa Vista First Phase Project is presented in Table 145 on page 1017. Standard LAUSD student generation rates are used to assess the students generated by all other cumulative development. This approach is used since the attributes which support the use of the Playa Vista Student Generation Model may not be applicable to other developments.

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<sup>427</sup> *The calculation of students generated by the Playa Vista First Phase Project is shown in Table 145 on page 1017.*

Table 145

## STUDENT GENERATION – PLAYA VISTA FIRST PHASE PROJECT

**A. Residential Development**

<u>Type of Residential Unit</u>	<u>Number of Residential Units<sup>a</sup></u>	<u>Elementary School</u>		<u>Junior High School</u>		<u>High School</u>	
		<u>Factor<sup>b</sup></u>	<u>Students</u>	<u>Factor<sup>b</sup></u>	<u>Students</u>	<u>Factor<sup>b</sup></u>	<u>Students</u>
<b><u>Owner Occupied</u></b>							
Studio/One Bedroom <sup>c</sup>	551	0.144	79	0.041	23	0.061	34
Two Bedroom	564	0.052	29	0.031	17	0.038	21
Three Bedroom	<u>776</u>	0.109	<u>85</u>	0.062	<u>48</u>	0.068	<u>53</u>
<b>Subtotal</b>	<b>1,891</b>		<b>193</b>		<b>88</b>		<b>108</b>
<b><u>Renter Occupied</u></b>							
Studio/One Bedroom	354	0.049	17	0.027	10	0.027	10
Two Bedroom	433	0.085	37	0.039	17	0.039	17
Three Bedroom	<u>81</u>	0.095	<u>8</u>	0.066	<u>5</u>	0.066	<u>5</u>
<b>Subtotal</b>	<b>868</b>		<b>62</b>		<b>32</b>		<b>32</b>
<b><u>Affordable Housing Units</u></b>							
Studio/One Bedroom	276	0.148	41	0.057	16	0.053	15
Two Bedroom	138	0.249	34	0.121	17	0.134	18
Three Bedrooms	<u>73</u>	0.454	<u>33</u>	0.256	<u>19</u>	0.292	<u>21</u>
<b>Subtotal</b>	<b>487</b>		<b>108</b>		<b>52</b>		<b>54</b>
<b><u>Total Units</u></b>							
Studio/One Bedroom	1,181		137		49		59
Two Bedroom	1,135		100		51		56
Three Bedroom	<u>930</u>		<u>126</u>		<u>72</u>		<u>79</u>
<b>Subtotal</b>	<b>3,246</b>		<b>363</b>		<b>172</b>		<b>194</b>

**B. Commercial Development**

<u>Uses</u>	<u>Forecasted Employment</u>					
	<u>Elementary School</u>		<u>Junior High School</u>		<u>High School</u>	
<u>Estimated Student Generation</u>	<u>Factor<sup>b</sup></u>	<u>Students</u>	<u>Factor<sup>b</sup></u>	<u>Students</u>	<u>Factor<sup>b</sup></u>	<u>Students</u>
Total Employees						<b>8,668<sup>c</sup></b>
8,668 Employees	0.026	225	0.012	104	0.012	104
<b>Total</b>						<b>433</b>



Table 145 (Continued)

## STUDENT GENERATION – PLAYA VISTA FIRST PROJECT

**C. Total Public Student Generation**

Grade Level	Students Generated by Residential Development	Students Generated by Commercial Development	Total Students
Elementary School (K-5)	363	225	588
Junior High School (6-8)	172	104	276
High School (9-12)	<u>194</u>	<u>104</u>	<u>298</u>
<b>Total Estimated Students</b>	<b>729</b>	<b>433</b>	<b>1,162</b>

<sup>a</sup> Data reflects that presented in the Playa Vista Phase I EIR, May 1993 and the Playa Vista Entertainment, Media and Technology District MND/EIR Addendum, August 1995.

<sup>b</sup> The forecast of students generated by the Playa Vista First Phase Project are based on the student generation factors used for the Proposed Project. The methodology is appropriate since both the Playa Vista First Phase Project and Proposed Project exhibit the same general development characteristics (i.e., housing tenure and type as well as employment location).

<sup>c</sup> Studio units will generate students at the same rate as 1 bedroom units.

Source: PCR Services Corporation based on the Playa Vista Student Generation Study, RPM Consulting, July 2003.

The Proposed Project and the relevant related projects would generate a total of 3,690 students: 1,159 elementary school (K-5) students, 1,145 junior high school (6-8) students, and 1,388 high school (9-12) students. These forecasts are shown in Table 146 on page 1019.

### 6.1 Elementary Schools

Based on existing and expanded facilities, as well as forecasted enrollment levels, the unutilized future enrollment capacity of the elementary school that would serve the related projects and the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would be exceeded, as shown in Table 147 on page 1020. This constitutes a significant impact as the unmet demand would require the construction of new facilities and/or modifications to the existing operational characteristics of Playa del Rey Elementary School. This conclusion is unchanged even with the additional capacity provided by the future Playa Vista Elementary School, as shown in Table 147. The school facility development fees that would be paid by all new development, under the provisions of SB 50 would constitute full mitigation of impacts of new developments, thereby reducing the cumulative impact to a less-than-significant level.

Table 146

## SUMMARY OF CUMULATIVE GROWTH BY SCHOOL ATTENDANCE BOUNDARIES

Student Generation Factors: <sup>a</sup>

School	Residential	Employment
Elementary	0.213	0.106
Junior High	0.097	0.049
High	0.120	0.060

Estimated Residential Units and Employment: <sup>b</sup>

	Residential Units <sup>c</sup>	Employment <sup>d</sup>
<b>Elementary School</b>		
Playa del Rey	812	867
<b>Junior High School</b>		
Marina del Rey	5,329	4,215
<b>High School</b>		
Venice	5,587	4,215

## Estimated Student Generation:

	Students Generated by Residential Development	Students Generated by Commercial Development	Total Students
<b>Elementary School</b>			
Playa del Rey	173	92	265
<b>Junior High School</b>			
Marina del Rey	517	207	724
<b>High Schools</b>			
Venice	670	253	923

## Total Public Student Generation:

	K-5	6-8	9-12	Total Students
<b>Related Projects <sup>e</sup></b>	853	1,000	1,221	3,074
<b>Proposed Project</b>	304	145	167	616
<b>Total Estimated Students</b>	<b>1,157</b>	<b>1,145</b>	<b>1,388</b>	<b>3,690</b>

<sup>a</sup> The forecast of students generated by related project development is based on the standard student generation rates developed by the LAUSD.

<sup>b</sup> Excludes the Playa Vista First Phase Project and Proposed Project.

<sup>c</sup> Employment forecasts for the individual related projects is presented in Section IV.J, Population, Housing and Employment.

<sup>d</sup> The population and employment forecasts consist of the related projects within the attendance boundaries of each respective school, plus a 25 percent increase in residential units and a 10 percent increase in employment to account for background growth.

<sup>e</sup> Includes all related projects, including the Playa Vista First Phase Project.

Source: PCR Services Corporation based on the Playa Vista Student Generation Study, RPM Consulting, July 2003.

Table 147

## CUMULATIVE IMPACTS ON LAUSD SCHOOL FACILITIES

	Playa del Rey Elementary School (K-5)	Marina del Rey Middle School (6-8)	Venice High School (9-12)
<b>Current and Projected Conditions</b>			
Operating Capacity <sup>a</sup>	311	1,549	3,033
2001-2002 Enrollment <sup>a</sup>	235	1,404	3,008
2001-2002 Unutilized Capacity	76	145	25
2006-2007 Projected Enrollment <sup>a</sup>	264	1,067	2,259
2001-2002 to 2006-2007 Projected Growth in Enrollment	29	(337)	(749)
2006-2007 Projected Unutilized Capacity	47	482	774
<b>Future Conditions with Existing Facilities</b>			
Student Generation			
Related Projects <sup>b</sup>	853	1,000	1,221
Proposed Project	304	145	167
Total Student Generation	1,157	1,145	1,388
<b>Projected Surplus/(Deficit)</b>			
Without Playa Vista School	(1,110)	(663)	(614)
With Playa Vista School <sup>c</sup>	(1098)	N/A	N/A
<b>Future Conditions with Expanded Facilities (Existing Facilities + New Classrooms)</b>			
Maximum Students in New Classrooms <sup>d</sup>	300	1,320	—
Total Capacity with Existing Facilities and New Classrooms <sup>e</sup>	611	2,869	3,033
2006-2007 Projected Unutilized Capacity With New Classrooms <sup>f</sup>	347	1,802	774
Student Generation			
Related Projects <sup>b</sup>	853	1,000	1,221
Proposed Project	304	145	167
Total Student Generation	1,157	1,145	1,388
<b>Projected Surplus/(Deficit) With New Classrooms</b>			
Without Playa Vista School	(810)	657	(614)
With Playa Vista School	(798)	N/A	N/A

<sup>a</sup> Ray Dippel, Los Angeles Unified School District Office of Environmental Health and Safety, March 2002. LAUSD uses a five-year resident enrollment projections for schools, with the most recent enrollment projection being for 2001-2002 through 2006-2007.

<sup>b</sup> Includes all related projects, including the Playa Vista First Phase Project.

<sup>c</sup> Included as part of the First Phase Playa Vista Project. For planning purposes, it is assumed that the Playa Vista elementary school will be open during the development of the Proposed Project and will have a capacity of 600 students.

<sup>d</sup> Based on the maximum number of new classrooms which can be accommodated at the school site multiplied by an average classroom size (i.e., number of students) of 25 for elementary schools and 30 for junior high and senior high schools. The maximum number of new classrooms at a school site is determined by the Rodriguez Consent Decree (1992) which limits the District's construction of new classrooms based on the availability of playground area. (Ray Dippel, Los Angeles Unified School District, March 2002).

<sup>e</sup> Calculated based on the addition of Operating Capacity and Maximum Students in New Classrooms.

<sup>f</sup> Calculated based on subtracting 2006-2007 Projected Enrollment from Total Capacity.

Source: PCR Services Corporation, November 2002.

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## 6.2 Middle School

Based on forecasted enrollment levels, the unutilized future enrollment capacity of the middle school that would serve the related projects and the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would be exceeded, as shown in Table 147 on page 1020. This constitutes a significant impact as the unmet demand would require the construction of new facilities and/or modifications to the existing operational characteristics of Marina del Rey Middle School. However, because of the additional student space available via new classrooms, this capacity deficiency could be eliminated. As the addition of new classroom capacity at Marina del Rey Middle School cannot be assured, it is conservatively concluded that cumulative development would result in a significant impact on middle school facilities as the unmet demand would require the construction of new facilities and/or modifications to the existing operational characteristics of Marina del Rey Middle School. Notwithstanding, the school facility development fees that would be paid by all new development under the provisions of SB 50 would satisfy all obligations of new development, thereby reducing the cumulative impact to a less-than-significant level.

## 6.3 High School

Based on forecasted enrollment levels, the unutilized future enrollment capacity of the high school that would serve the related projects and the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would be exceeded as shown in Table 147 on page 1020. This constitutes a significant impact as the unmet demand would require the construction of new facilities and/or modifications to the existing operational characteristics of Venice High School. Notwithstanding, the school facility development fees that would be paid by all new development under the provisions of SB 50 would satisfy all obligations of new development, thereby reducing the cumulative impact to a less-than-significant level.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**L. PUBLIC SERVICES**  
**(4) PARKS AND RECREATION**

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**1.0 INTRODUCTION**

This section addresses the potential impacts of the Proposed Project on the demand for parks and recreational facilities as well as the ability of existing and proposed parks and recreational facilities to accommodate this increase in demand. The analysis evaluates the Project's proposed park system compared to City goals for local park space, regulatory requirements and existing service levels in the Project area. Areas credited as contributing to the Project's park system include neighborhood/community parks and other areas that provide for recreational activities such as bikeways and trails. Such facilities are referred to as "active recreation." The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

The City Department of Recreation and Parks, the County Department of Parks and Recreation, the Los Angeles County Department of Beaches and Harbors, and the Culver City Parks and Recreation Division operate parks and recreational facilities within a 2-mile radius of the Proposed Project site. These facilities include recreational parks, a marina, and bicycle paths.

**2.0 SETTING**

**2.1 Regulatory Framework**

**2.1.1 State Level**

The California Government Code, Section 66477 (Quimby Act) authorizes Cities and Counties to enact an ordinance which would require the dedication of land or payment of fees for park or recreational purposes for projects involving residential subdivisions. Quimby fees do not, however, apply to commercial or industrial subdivisions.<sup>428</sup> The Quimby Act provides that the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit.

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<sup>428</sup> *California Government Code, Section 66477 (Quimby Act).*

### 2.1.2 Local Level

According to the City of Los Angeles policies (discussed further below), a satisfactory park and recreation system should address standards in three respects: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Two sets of policy documents, the Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, and local plans (e.g., Community and Specific Plans), establish planning efforts and activities related to parks, recreation facilities, and open space areas in the City. The PRP provides citywide goals, objectives, and recommendations concerning parks and recreation facilities; while, the local plans provide standards for a specific area of the City. The local plan for the Proposed Project is the Area D Specific Plan (Ordinance 170,785).

The City has also included numerous park and open space policies which address recreation uses throughout the City in the “Citywide General Plan Framework, An Element of the City of Los Angeles General Plan,” (re-adopted in August 2001). Of the numerous general policies, one policy, in particular addresses recreation uses in more dense mixed-use development. Policy 9.23.5 at page 9-15 states the following:

“Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.”

#### 2.1.2.1 Public Recreation Plan (PRP)

The PRP was adopted in 1980 by the City Council.<sup>429</sup> The PRP focuses on physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts. To a large extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radius and projected population levels.

<sup>429</sup> *City of Los Angeles, Public Recreation Plan, a Portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*

Based on the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include both neighborhood and community recreational sites and open space. The PRP also includes “small” or triangle parks in this category. A small park is usually less than an acre. A neighborhood recreation site is intended to serve its immediate neighborhood. It should provide space and facilities for outdoor and indoor recreation activities to meet the special needs of the residents of all ages within the particular neighborhood it serves. Neighborhood parks typically include a recreation building, a multipurpose field, a hard court area, play apparatus, a picnic area, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be 10 acres, within the City of Los Angeles, they are usually 1 to 5 acres in size. A community recreation site is designed to serve residents of all ages in several surrounding neighborhoods. It provides facilities to serve a wider range of interests, including a community building, multipurpose fields, hard court areas, parking, maintenance service areas, and play areas. It may also include baseball diamonds, football and soccer fields, tennis and handball courts and a swimming pool. The ideal size for a community recreation site is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The service radius for a neighborhood park should be approximately 0.5 mile, while an approximate 2-mile radius is acceptable for a community facility. The desired long-range (minimum) standard for local parks is based on 2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks or 4 acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of 1 acre per 1,000 persons for neighborhood parks and 1 acre per 1,000 persons for community parks. Finally, the PRP establishes that no park or recreational facility should be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or unless the need is diminished due to population and/or land use changes.

### **2.1.2.2 City of Los Angeles Zoning and Specific Plan Requirements**

The City of Los Angeles has established a local ordinance, as authorized under the state Quimby Act, to require land dedication or payment of fees for park or recreational purposes for projects involving residential subdivisions. Section 17.12 of the Los Angeles Municipal Code (LAMC) provides standards for land acreage requirements by project density and identifies fees per unit by zoning designation.

The existing Playa Vista Area D Specific Plan provides that the requirements of Section 17.12 may be satisfied by (i) dedicating and restoring the Ballona Wetlands, as they are

defined in the Area B Specific Plan and (ii) providing park or recreation space in an amount equal to 100 sq.ft. per dwelling unit within the Area D Specific Plan area.<sup>430</sup>

## **2.2 Existing Conditions**

### **2.2.1 Regional Context**

Park and recreational facilities surrounding the Proposed Project site are operated by the City of Los Angeles Department of Recreation and Parks, the County of Los Angeles Department of Parks and Recreation, the County of Los Angeles Department of Beaches and Harbors, and the Culver City Recreation and Leisure Services Division. The following discussion provides an overview of existing conditions for park and recreation facilities operated and maintained by the above-mentioned agencies within a 2-mile radius of the Proposed Project site.

#### **2.2.1.1 County Parks and Recreational Facilities**

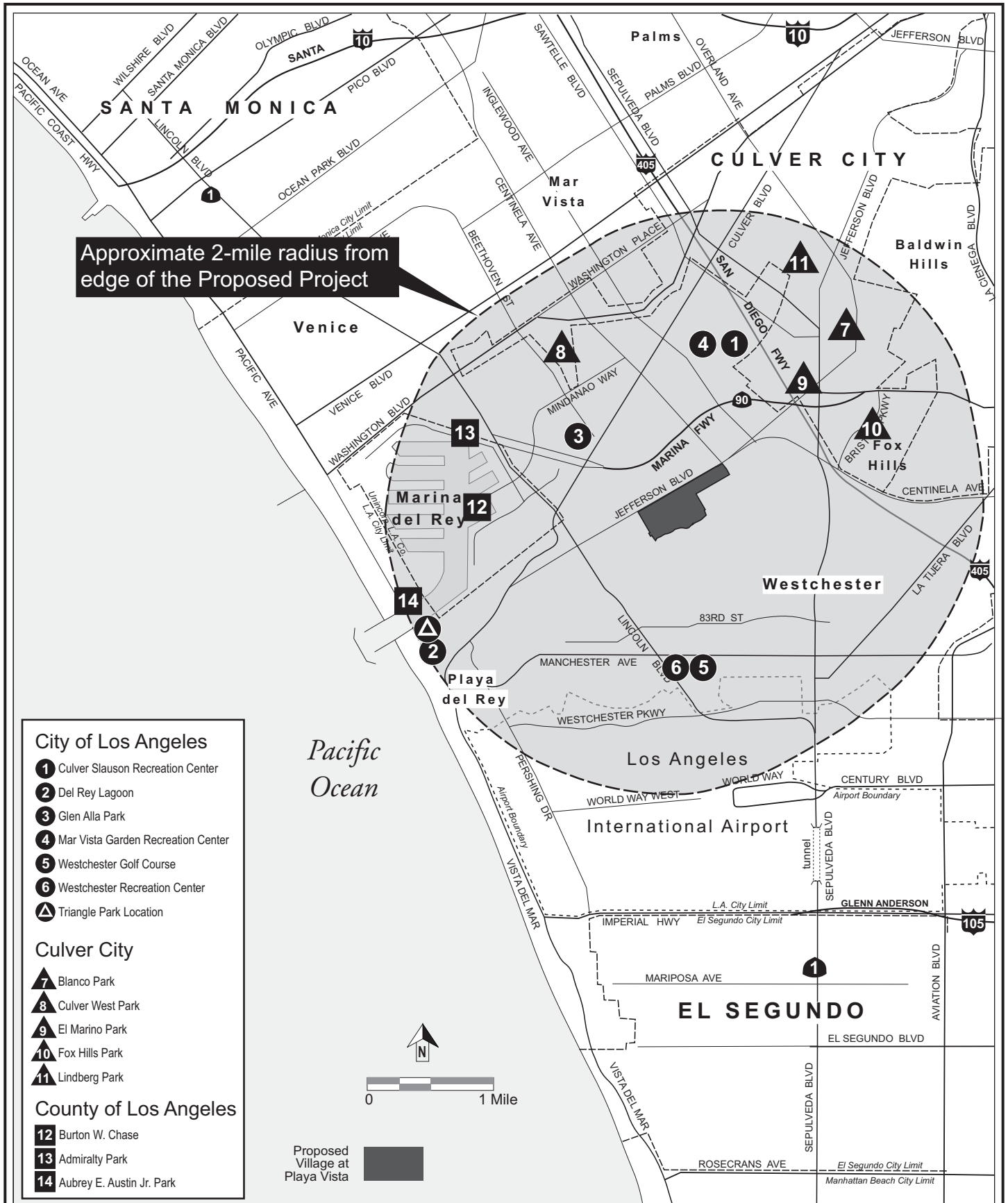
County park and recreational facilities within 2 miles of the Proposed Project are shown on Figure 92 on page 1026, and listed in Table 148 on page 1027. These parks total 19.2 acres. These facilities are managed by the County of Los Angeles Department of Beaches and Harbors and include Burton W. Chase Park, Admiralty Way Park, and Aubrey E. Austin Park.

The Marina del Rey Small Craft Harbor is located approximately 1.5 miles west of the Project site and contains eight separate boat basins and the capacity for 6,100 boatslips, public swimming and beach areas, boat docks available for short-term use, and public boat ramps. Located near the southeast end of the marina, Fisherman's Village is a collection of public-oriented commercial shops and restaurants, boat rentals, and other water-related recreational services. Burton W. Chase Park provides about 10 acres of landscaped park and recreation area, including a community building, metered parking spaces with overflow pay parking within walking distance of the park, picnic shelters, barbecue units, fishing docks and fish-cleaning structures, lawn and landscaped areas, bicycle path and bike racks, restroom facilities, benches, plazas, and a viewing tower. Admiralty Park provides about 8 acres of landscaped jogging and bike paths, benches, an 18-station physical fitness course, viewing and lawn areas, and two pay parking lots. Aubrey E. Austin Park is a memorial park of less than 1 acre located on the

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<sup>430</sup> *Playa Vista Area D Specific Plan. Ordinance No. 160,523, effective December 26, 1985; amended by Ordinance No. 170,785, effective January 13, 1996. Section 4-B, Page 4-2.*





**City of Los Angeles**

- 1 Culver Slauson Recreation Center
- 2 Del Rey Lagoon
- 3 Glen Alla Park
- 4 Mar Vista Garden Recreation Center
- 5 Westchester Golf Course
- 6 Westchester Recreation Center
- △ Triangle Park Location

**Culver City**

- 7 Blanco Park
- 8 Culver West Park
- 9 El Marino Park
- 10 Fox Hills Park
- 11 Lindberg Park

**County of Los Angeles**

- 12 Burton W. Chase
- 13 Admiralty Park
- 14 Aubrey E. Austin Jr. Park

Proposed Village at Playa Vista



**Figure 92  
Public Recreation Facilities  
Within Two-Mile Radius of the  
Proposed Project Perimeter**

Sources: City of Los Angeles Recreation and Parks Dept.  
County of Los Angeles, Dept. of Beaches and Harbors  
Culver City Parks and Recreation Division, 2002

Table 148

**COUNTY RECREATIONAL FACILITIES WITHIN A TWO-MILE RADIUS  
OF THE PROPOSED PROJECT**

Map Number <sup>a</sup>	Facility	Acres	Features
12	Burton W. Chase Park	10.0	Community building, picnic shelters, barbecue units, bike path, fishing dock, benches, and lawn areas.
13	Admiralty Way Park	8.2	Bike path, self-guiding exercise facility, jogging path, benches, and lawn areas.
14	Aubrey E. Austin Park <sup>b</sup>	1.0	Fishing jetty, view piers, benches, promenade, and lawn areas.
<b>Total</b>		<b>19.2</b>	

<sup>a</sup> Refer to Figure 92 for map locations of recreational facilities.

<sup>b</sup> Estimated approximate acreage provided by Gregory Woodell, Supervisor of Planning, County of Los Angeles, Department of Beaches and Harbors, February 27, 1991; verified by telephone, December 23, 2002.

Source: County of Los Angeles, Department of Beaches and Harbors, April 1990, "Recreational Opportunities and Facilities, Marina del Rey Small Craft Harbor." Verified by Telephone Conversation with Gregory Woodell, County of Los Angeles, Department of Beaches and Harbors, December 23, 2002.

Marina's north jetty. This park provides view piers, benches, a promenade, landscaped and lawn area, and parking.<sup>431, 432</sup>

Additionally, the County Public Works Department operates the South Bay and Ballona Creek Bicycle Trails. The South Bay Bicycle Trail extends 22 miles along the coast of Santa Monica Bay from Pacific Palisades to the City of Torrance. The Ballona Creek Bicycle Trail extends 7.5 miles along Ballona Creek, on the north side of the Ballona Channel.<sup>433</sup> Additional discussion of bicycle trails in the area can be found in Section IV.K.(3), Bicycle Plan.

<sup>431</sup> County of Los Angeles, Department of Beaches and Harbors, April 1990, "Recreational Opportunities and Facilities, Marina del Rey Small Craft Harbor," page 1. Verified by Telephone Conversation with Greg Woodell, Department of Beaches and Harbors, December 23, 2002.

<sup>432</sup> County of Los Angeles, Department of Beaches and Harbors, 1989, "Marina del Rey Fact Sheet," June 1986. Verified by Telephone Conversation with Greg Woodell, Department of Beaches and Harbors, December 23, 2002.

<sup>433</sup> County of Los Angeles, Department of Public Works, 1990, "South Bay and Ballona Creek Bicycle Trails," June 1990. Verified by Telephone Conversation with Greg Woodell, Los Angeles County Department of Beaches and Harbors, December 23, 2002.

### 2.2.1.2 City of Los Angeles Parks and Recreational Facilities

Six City park and recreational facilities, totaling approximately 114 acres, are located within a 2-mile radius of the Project site as listed in Table 149 on page 1029 and shown on Figure 92 on page 1026.<sup>434, 435, 436</sup> Two (2) of these facilities consist of recreation centers (Westchester Recreation Center and Mar Vista Gardens Recreation Center). The Westchester Recreation Center includes the following amenities: community building, outdoor gym, baseball diamonds, children's play areas, football and soccer fields, picnic areas, a seasonal swimming pool, and shuffleboard, and courts for tennis, basketball, volleyball, and handball. A new recreational facility is under construction. Mar Vista Garden Recreation Center (2 acres of land area maintained by the Housing Authority of the City of Los Angeles) provides the following features: a community building; baseball, soccer, and football fields; courts for basketball, handball, and volleyball; and a children's play area. Del Rey Lagoon consists of approximately 13 acres, and provides a small craft area, safety program, children's play and picnic area, as well as baseball and basketball facilities. Westchester Golf Course, approximately 69 acres in size, is a 15-hole executive golf course and includes a driving range. This City of Los Angeles public recreational facility is located on Los Angeles World Airports (LAWA) property and is managed by LAWA. The remaining two parks (Culver Slauson Park and Glen Alla Park) are each less than 5 acres in size and provide all or some of the following: landscaped areas, picnic areas, children's play areas, basketball, tennis, and volleyball courts. In addition to the six parks described above, there is one triangle park below the Ballona Channel. This is a small landscaped park without facilities.

### 2.2.1.3 City of Culver City

Five Culver City recreational facilities are located within a 2-mile radius of the Proposed Project, totaling 23.9 acres, as listed in Table 150 on page 1030, and shown on Figure 92 on page 1026. These recreational facilities provide a range of activities, including community/activity building, softball diamonds, multipurpose fields, fitness course, play equipment, picnic area and barbecues, as well as courts for tennis, basketball, paddle tennis, volleyball, and handball.<sup>437</sup>

<sup>434</sup> *City of Los Angeles, Department of Recreation and Parks, "Pacific Region," map and pamphlet, revised 8/98.*

<sup>435</sup> *City of Los Angeles Department of Recreation and Parks, Real Property Listing, as of September 2002. Real Estate and Asset Management.*

<sup>436</sup> *In addition to the City operated parks listed here, community volunteers operate Titmouse Park on City of Los Angeles Property. Titmouse Park is less than an acre in size and is located on Culver Boulevard, approximately 2 miles southwest of the Proposed Project site. The park includes garden type landscaping, benches, and a picnic table.*

<sup>437</sup> *Culver City Recreation and Leisure Services Division, Human Services Department. Culver City website: <http://www.culvercity.org/citygov/humanservices/parks/parksites.html>.*

**Table 149**

**CITY OF LOS ANGELES RECREATIONAL FACILITIES  
WITHIN A 2-MILE RADIUS OF THE PROPOSED PROJECT<sup>a</sup>**

<b>Map Number<sup>b</sup></b>	<b>Facility</b>	<b>Acres</b>	<b>Park Classification</b>	<b>Features</b>
1	Culver Slauson Park	3.3	Neighborhood	Basketball, children's play area, paddle tennis
2	Del Rey Lagoon	12.7	Neighborhood	Baseball, basketball, picnic area and barbecue, children's play areas, small craft, safety program
3	Glen Alla Park	4.8	Neighborhood	Picnic area, child's play areas, tennis, paddle tennis and volleyball
4	Mar Vista Gardens Recreation Center <sup>c</sup>	2.0	Neighborhood	Community building, baseball, basketball, football, handball, children's play areas, volleyball, and soccer.
5	Westchester Golf Course <sup>d</sup>	69.0	Regional	15-hole executive golf course, driving range
6	Westchester Recreation Center	22.4	Community	Community building, baseball, basketball, children's play area, picnic area and barbecue, football, shuffleboard, tennis, outdoor gym, and swimming
	<b>Total</b>	<b>114.2</b>		

<sup>a</sup> Specific acreage is not available for the triangle park.

<sup>b</sup> Refer to Figure 92 on page 1026 for map locations of recreational facilities.

<sup>c</sup> City of Los Angeles, Department of Recreation and Parks, Real Property Listing, as of September 2000; Real Estate and Asset Management.

<sup>d</sup> City of Los Angeles, International Airport Master Plan Draft EIS/EIR, January 2001.

Source: City of Los Angeles, Department of Recreation and Parks, "Pacific Region," Map and pamphlet, revised August 1998; City of Los Angeles, Department of Recreation and Parks, Real Property Listing, as of September 2002; Real Estate and Asset Management.

### **2.2.2 Conditions Within the Proposed Project Site**

The Proposed Project site is located in the Pacific Region of the City of Los Angeles Department of Recreation and Parks' jurisdiction. No public parkland currently exists on-site.

### **2.2.3 Conditions Surrounding the Proposed Project Site**

As described in the previous sections, several park and recreational facilities are located within a 2-mile radius of the Project site, totaling approximately 157 acres. Provision of park and recreational space citywide, within the City of Los Angeles, is estimated at 0.7 acre per 1,000 residents.<sup>438</sup> The Proposed Project is located within the Westchester-Playa del Rey District

<sup>438</sup> This amount of park space was obtained from the City of Los Angeles Department of Recreation and Parks, Real Property Listing, as of September 2002, prepared by Real Estate and Asset Management and analyzed by PCR Services Corp. This amount of park space includes neighborhood/small parks and community parks. (Footnote continued on next page)

Table 150

**CULVER CITY RECREATIONAL FACILITIES  
WITHIN A 2-MILE RADIUS OF THE PROPOSED PROJECT**

Map Number <sup>a</sup>	Facility	Acres	Features
7	Blanco Park <sup>b</sup>	3.3	Picnic area and barbecue, softball diamond, restrooms, play equipment, volleyball court, fitness course, handball court, basketball courts, and community building.
8	Culver West Park	3.0	Softball diamond, basketball court, tennis court, paddle tennis court, sand volleyball court, play equipment, handball court, restrooms, and picnic area and barbecue.
9	El Marino Park <sup>c</sup>	3.2	Softball diamond, basketball court, handball courts, game room, restrooms, and picnic area and barbecue.
10	Fox Hills Park	10.0	Tennis courts, paddle tennis courts, sand volleyball courts, picnic area and barbecue, game room, softball diamond, play equipment, fitness course, and restrooms.
11	Lindberg Park	4.4	Softball diamond, tennis court, sand area, basketball court, picnic area and barbecue, activity building, handball court, fitness course, restrooms, game room, and play equipment.
<b>Total</b>		<b>23.9</b>	

<sup>a</sup> Refer to Figure 92 for map locations of recreational facilities.

<sup>b</sup> Includes 1.8 acres owned by the Culver City Unified School District.

<sup>c</sup> Includes 1.6 acres owned by the Culver City Unified School District.

Source: Culver City Recreation and Leisure Services Division. Culver City website: <http://www.culvercity.org/citygov/humanservices/parks/parksites.html>.

Plan area, where the provision of local park and recreational space is estimated at 0.8 acre per 1,000 residents.<sup>439</sup> The City of Los Angeles service ratio within 2 miles of the Proposed Project is 0.51 acre per 1,000 population.<sup>440</sup> None of these current ratios meet the City's stated goals for the short- or long-term provision of park space.

*Neighborhood/small parks are classified by the Department of Recreation and Parks as developed acreage less than or equal to 5 acres. Using this methodology, there are 330.1 acres of neighborhood parks Citywide. Community parks are classified by the Department of Recreation and Parks as developed acreage greater than 5 acres but less than 50 acres. Using this methodology, there are 2,245.2 acres of community parks Citywide. The ratio was obtained using the 2002 City of Los Angeles population (3,812,923), which was interpolated by PCR Services Corp. from the 2000 Census City of Los Angeles population (3,694,820) and SCAG's 2005 projection for the City of Los Angeles (3,990,077). 2,575.3 acres of parks (330.1 + 2,245.2) for 3,812,923 people equates to 0.7 acre per 1,000 population.*

<sup>439</sup> Based on 39.29 acres of neighborhood/community parks and 54,851 persons within the Westchester-Playa del Rey Community Plan Area (2002 population, as presented in Section IV.J, Population, Housing and Employment, of the EIR).

<sup>440</sup> Based on the 45.2 acres of neighborhood/community parks listed in Table 149, and a population of 88,631. The population was estimated by PCR services Corp. using the 2000 census data for the census tracts within the two-mile radius and interpolating between the 2005 SCAG RTP projections for the tracks

### **3.0 IMPACT ANALYSIS**

#### **3.1 Methodology**

The analysis of parks and recreation impacts is based on the identification of service ratios that compare the amount of public recreation space available to the population that would utilize that space. Such service ratios are identified for the Proposed Project, for existing service levels in the Project's District Plan area and standards established in the City's Public Recreation Plan. The various ratios are compared to draw a conclusion regarding the Project's potential significance on park and recreation space.

#### **3.2 Significance Thresholds**

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. J.4-3), a finding of significance involving recreation and park services shall be made on a case-by-case basis, considering the following factors:

- (1) The net population from the Proposed Project;
- (2) The demand for recreation and park services at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to demand; and
- (3) Whether the Project includes features that would reduce the demand for recreation and park services (e.g. on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Based on these factors, the Proposed Project would have a significant impact on parks and recreation, if:

- The Project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and service.

#### **3.3 Project Design Features**

The Proposed Project includes open space and park areas which are categorized as active open space and passive open space. The open space provided by the Proposed Project is illustrated on Figure 93 on page 1032, and shown in Table 151 on page 1033.

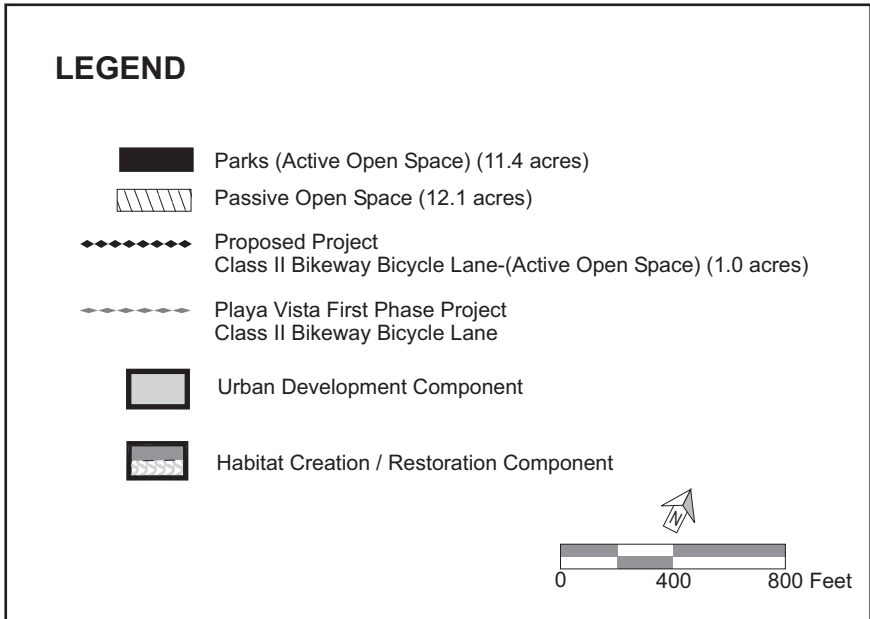
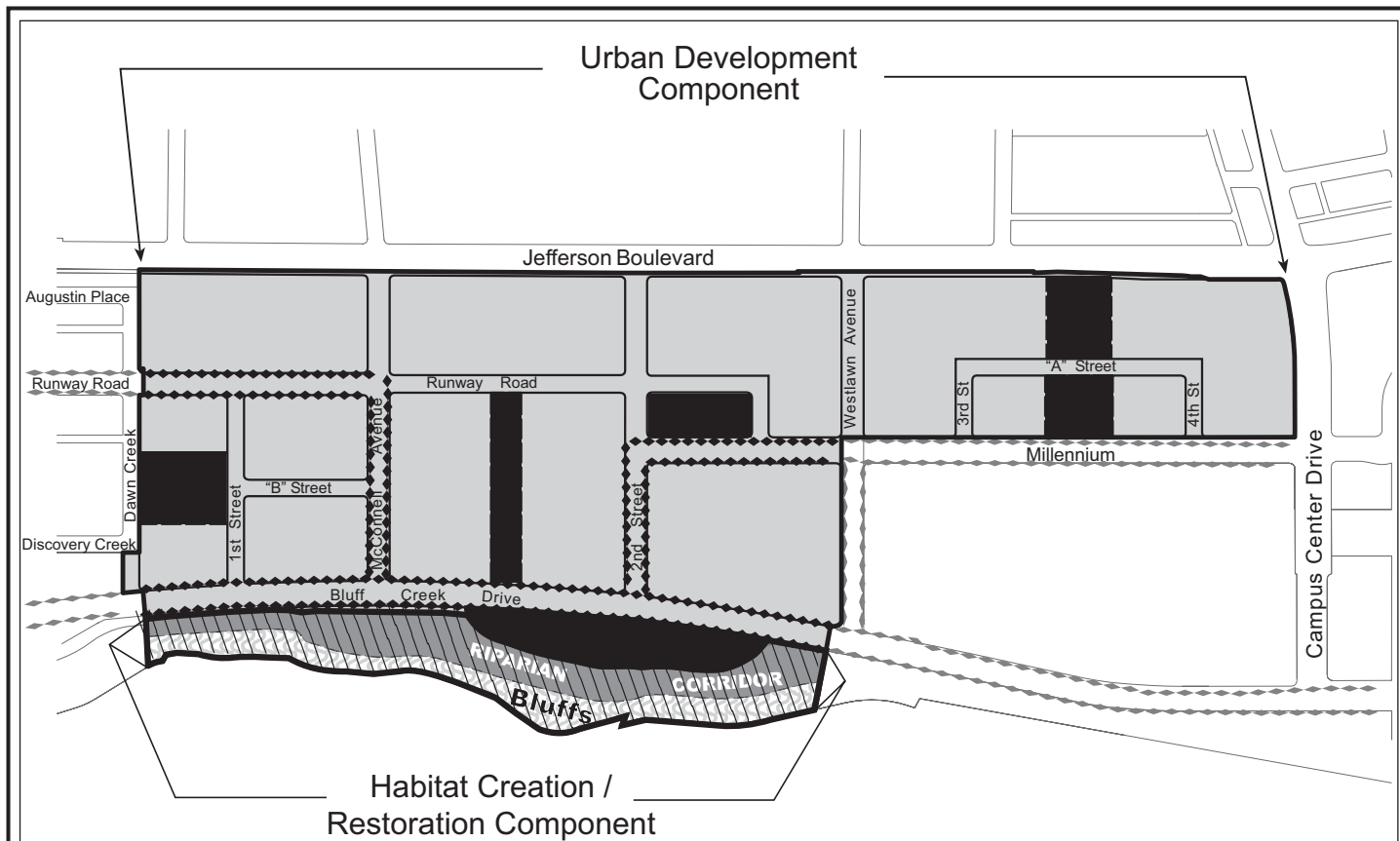


Figure 93  
Proposed Project Open Space



Source: PCR Services Corporation, July 2003

**Table 151****RECREATION AND OPEN SPACE AREAS**

<b>Type</b>	<b>Size (ac.)</b>
Urban Development Component	
Active	
Parks	11.4
Bikeways	1.0
Passive <sup>a</sup>	0.4
Total	12.8
Habitat Restoration Component - Passive Open Space	
Riparian Corridor	6.7
Bluffs	5.0
Total	11.7

<sup>a</sup> Upland habitat located along the edge of the riparian corridor, adjacent to Bluff Creek Drive.

Source: Playa Capital Company, 2002.

The Project's Urban Development Component includes 12.4 acres of land set aside for active recreational opportunities for the Proposed Project's population. Further, the Applicant proposes to fund, construct and maintain the amenities and facilities on the parks within the site. The Habitat Creation/Restoration Component adds an additional 11.7 acres of passive open space. As the passive open space does not allow for recreational activities, it is not credited in the analysis of the Project's impacts on parks. Nonetheless, the passive open space would contribute to the Project's open space character and is described below. In addition, the Proposed Project proposes to provide 5.76 acres of park space within the adjacent Playa Vista First Phase Project or on land controlled or improved by the applicant and its affiliates (i.e., nearby off-site locations).

### **3.3.1 Urban Development Component**

The Proposed Project includes areas that would serve as typical community/neighborhood parks. In addition to providing recreational opportunities, the parks act as organizing features within the Project site and provide visual breaks in development at several locations. There are approximately 11.4 acres of such parks throughout the Project site. In addition to providing this parkland, the Proposed Project would include the improvement of these parks with landscaping, hardscaping, walking, jogging and bicycle trails, children's play areas, recreational fields and other recreational facilities, (i.e. basketball courts, skating rings, etc.) with an emphasis on active activities, as appropriate. Further, maintenance of the parks within the Proposed Project would be provided in perpetuity by a property owner's association.



The Proposed Project also includes 1.0 acre of bicycle lanes within the rights-of-way along Bluff Creek Drive, McConnell Avenue, 2nd Street, and portions of Runway Road, and Millennium. Thus, the total active open space within the Proposed Project is 12.4 acres. In addition, if the assisted living component of the Proposed Project's Equivalency Program were implemented, an additional 0.12 acre of park space would be provided for each 50 assisted living units. The Urban Development Component also includes 0.4 acre of passive open space in upland habitat.

Also, private open space would be provided throughout the Proposed Project to fulfill open space requirements associated with each development parcel. A variety of private and semi-private uses have been proposed for these open space areas, including courtyards, gardens, plazas, and landscaped buffer areas. This private open space would meet the requirements included in City Ordinance 171,753 (effective November 17, 1997). This ordinance requires that all buildings containing six or more dwelling units on a lot must provide, at a minimum, the following usable open space per dwelling unit: 100 sq.ft. for each unit having less than three habitable rooms, 125 sq.ft. for each unit having three habitable rooms, and 175 sq.ft. for each unit having more than three habitable rooms. These areas would not necessarily be accessible to the general public, and are not credited in the analysis below. However, the private open space would meet local population needs for open space, thus lessening the impacts on public open space.

### **3.3.2 Habitat Creation Restoration/Component**

The Habitat Creation/Restoration Component includes 6.7 acres of riparian habitat that completes the creation of a 25-acre riparian corridor along the foot of the Westchester Bluffs. The riparian corridor is located south of Bluff Creek Drive, and continues east and west into the Playa Vista First Phase Project. The riparian corridor feeds into the First Phase Freshwater Marsh, west of Lincoln Boulevard, thus establishing a 51-acre Freshwater Wetland System. This component also includes 5.0 acres of restored bluffs.

## **3.4 Project Impacts**

### **3.4.1 Proposed Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies three factors to be used for determining the significance of a project's impacts on parks and recreation services (see Subsection 3.2, above). The first and third factors are two components that contribute to the significance of a project's impact as they combine to identify a project's demand for parks and recreation services. The second factor, which includes this demand, identifies the components of the significance threshold. The second factor also indicates that Project impacts be analyzed at Project buildout relative to the services that would be available at that time. Notwithstanding, the state CEQA Guidelines indicate that the analyses presented in an EIR reflect the amount of

impact relative to existing, rather than future, conditions.<sup>441</sup> Consistent with the direction set forth in the CEQA Guidelines, the analysis of Project impacts presented in this section is based on the impact of the Project relative to existing conditions. Furthermore, an analysis pursuant to the second factor identified above (i.e., Project impacts at Project buildout relative to the parks and recreation services that would be available at that time) is presented in Section 6.0, Cumulative Impacts.

The Urban Development Component of the Proposed Project would introduce new population and demand for park space to the Project site. It would also introduce a system of active open space areas to meet population recreational needs. The Habitat Restoration Component of the Project includes neither new population, nor active recreational services. Therefore, the following discussion of Project impacts reflects only activities occurring within the Urban Development Component.

The Project's Urban Development Component includes 2,600 dwelling units estimated to generate 5,720 residents.<sup>442</sup> As discussed above, the area also includes 12.4 acres of active open space, including 11.4 acres of parks and 1.0 acre of bike lanes, exclusive of private open space such as courtyards and plazas that would help to meet the Project's demand.

As shown in Table 152 on page 1036, the provision of 11.4 acres of parks within the Proposed Project is equivalent to 2.0 acres of parks per 1,000 residents and would increase the service ratio in the District Plan area from 0.7 acre per 1,000 population to 0.8 acre per 1,000 population. The 11.4 acres would meet the PRP's short and intermediate range standards for community and neighborhood parks of 2 acres per 1,000 residents, but would be approximately 2.0 acres less per 1,000 residents than the PRP's long-term goal of 4 acres per 1,000 population. Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of 3 acres per 1,000 population in land dedication or fees, unless it is already exceeding that ratio.

Municipal Code Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or in-lieu fees. Based on this formula, the Proposed Project would be required to dedicate approximately 17.65 acres of park and recreation space, pay in-lieu fees totaling \$8,057,400,<sup>443</sup> improve park and recreational facilities serving residents of the subdivision, or provide a combination of all three. If the Proposed Project were to satisfy this requirement

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<sup>441</sup> *California Environmental Quality Act, CEQA Guidelines, Article 9, Section 15125(a).*

<sup>442</sup> *For further information regarding the population estimate, refer to Section IV.J, Population, Housing and Employment.*

<sup>443</sup> *Based on 2,600 units at the current R4 fee per unit of \$3,099 as of July 3, 2003.*

Table 152

## PARK SERVICE LEVELS

Park Service Levels <sup>a</sup>

Area	Population	Park Acreage	Ratio (acres/1,000 Population) <sup>b</sup>
Westchester-Playa del Rey Plan	54,851 <sup>c</sup>	39.3 <sup>d</sup>	0.7
Los Angeles City			0.7 <sup>e</sup>
Los Angeles City – 2-mile radius	88,631	45.2	0.5 <sup>f</sup>
Proposed Project	5,720 <sup>g</sup>	11.4 <sup>h</sup>	2.0

## Project Impact on Service Levels in City District Plan Area (Active Recreation)

Area	Population	Park Acreage	Ratio (acres/1,000 Population) <sup>b</sup>
Existing in District Plan Area	54,851	39.3	0.7
Proposed Project	5,720	11.4	2.0
Existing with Proposed Project	60,571	50.7	0.8

<sup>a</sup> Includes Small, Neighborhood, and Community Facilities.

<sup>b</sup> Ratio of park and open space acres per 1,000 population; calculated as park acreage/Population\*1,000.

<sup>c</sup> 2002 population, as presented in Section IV.J, Population, Housing and Employment of this EIR.

<sup>d</sup> Nora Dresser, City of Los Angeles Department of Recreation and Parks, telephone conversation with PCR Services Corporation, December 11, 2002.

<sup>e</sup> Ratio calculated as park acres/1,000 residents. Acreage obtained from City of Los Angeles Department of Recreation and Parks, Real Property Listing, as of September 2002, prepared by Real Estate and Asset Management. Population obtained using the 2002 City of Los Angeles population interpolated by PCR Services Corp. from the 2000 Census City of Los Angeles population and SCAG's 2005 projection for the City of Los Angeles. (See Footnote 438 for further discussion.)

<sup>f</sup> Based on the 45.2 acres of neighborhood/community parks listed in Table 149 on page 1029, and a population of 88,631. The population was estimated by PCR services Corp. using the 2000 census data for the City census tracts within the 2-mile radius and interpolating between the 2005 SCAG RTP projections for those tracts.

<sup>g</sup> Derivation of the Population estimates for the Proposed Project are included in Section IV.J, Population, Housing and Employment.

<sup>h</sup> Based on community/neighborhood park space. Refer to Table 151 on page 1033.

Source: PCR Services Corporation, 2002.

exclusively through 17.65 acres of parkland dedication, the City would be responsible for the cost of both improvements and ongoing maintenance.

The parks and recreational space provided by the Proposed Project would exceed the requirements established in LAMC Section 17.12 by providing 11.4 acres of parks, as well as improving those parks with landscaping, hardscaping, walking, jogging and bicycle trails, children's play areas, recreational fields and other recreational facilities, (i.e. basketball courts, skating rings, etc.) with an emphasis on active activities, as appropriate. Further, maintenance of the parks within the Proposed Project would be provided in perpetuity by a property owner's association. The value of these improvements is conservatively estimated to be in excess of the

\$8.1 million of in-lieu fees established in LAMC 17.12.<sup>444</sup> Therefore, the Proposed Project is providing: (1) parkland at a ratio in excess of 2 acres per 1,000 population; (2) improvements valued in excess of the fees established within the City's parkland dedication ordinance (which is equivalent to 3 acres per 1,000 population); and (3) ongoing maintenance in perpetuity.

Therefore, the 12.4 acres of active open space provided by the Proposed Project, consisting of 11.4 acres of parks and 1.0 acre of bike lanes, would meet the PRP's short and intermediate range goals and would improve the existing service ratio within the District Plan Area from 0.7 acre per 1,000 residents to 0.8 acre per 1,000 residents. Additionally, in combination with the value of the improvements of the parkland and the ongoing maintenance, the Proposed Project would provide over 2 acres of parks/1,000 residents plus the equivalent of 3 acres of parks/1,000 residents in park and recreational improvements and/or payment of fees, which meets the short-term and intermediate-range standards of the PRP, as well as the requirements of LAMC Section 17.12.

Thus, under any of these measures of demand, the demand for park or recreational facilities generated by the Proposed Project would be adequately accommodated by existing or planned facilities and service, and no significant impacts on parks and recreation would occur. Mitigation measures are proposed below to require implementation of the Project Design Features which serve to eliminate potential significant impacts discussed above.

### **3.4.2 Equivalency Program Impacts**

The preceding parks analysis addressed impacts associated with increased population, and resulting affects on the demand for parks and recreation space. As indicated, the Proposed Project would have a residential population of 5,720 residents. The analysis was based on service ratios for park space expressed as the amount of park space per 1,000 residents.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters as the Proposed Project, and would occur at relatively limited locations within the Project site. Except as noted below, all of Equivalency Scenarios would include parks, bicycle lanes and passive open space that are the same as that included with the Proposed Project. Further, the Project Design Features regarding the funding, construction and maintenance of the parks would be implemented as indicated for the Proposed Project.

One of the three Equivalency Scenarios, the All Retail Scenario, would add no new residential population to the site, and would have impacts that are the same as those described for

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<sup>444</sup> *Based on estimated improvement costs of \$17 per square foot for the 11.4 acres of parkland provided within the Proposed Project. Source – Playa Capital Co., 2003.*

the Proposed Project. The two equivalency scenarios that include assisted living would add an additional 240 residents to the Project site. These two scenarios also include an additional Project Design Feature that would increase the amount of park space by 0.12 acre for every 50 units of assisted living.

As described in the above analysis, the Proposed Project includes 11.4 acres of park space resulting in a service ratio of 2.0 parks per 1,000 population for the Project's 5,720 residents. The All Retail Scenario would include the same population and park provisions as the Proposed Project. The two scenarios with assisted living units would increase the population by 240 to 5,960, and the amount of park space by 0.48 acre. The park service ratio (11.88 acres of parks per 5,960 residents) would remain at 2.0 acres of parks for 1,000 population.

Therefore, the provision of park and recreation space would be the same as that of the Proposed Project under the Equivalency Program, with similar Project Design Features and mitigation measures. As was the case with the Proposed Project, park and recreation services would include sufficient park space to meet the PRP's short and intermediate range goal of 2 acres per 1,000 population and the requirements of LAMC Section 17.12, and meet the demand for park space. As with the Proposed Project, impacts would be less than significant.

### **3.4.3 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These infrastructure improvements would reduce the traffic and water utility impacts of the Proposed Project. They would not add new population to the area. Therefore, they would not increase the demand for parks and recreational services, beyond the demand identified in the above analyses.

However, implementation of the off-site measures could result in secondary impacts arising from implementation of one of the Project's mitigation measures. That measure requires roadway widening at the intersection of Centinela Avenue and Culver Boulevard. This improvement would require a roadway widening of approximately 12 feet, for approximately 250 feet along the north side of South Culver Boulevard. This widening would alter the large median lying between North and South Culver Boulevards at an area that includes a pedestrian trail, and Class I bicycle trail. An adjustment of the trail locations within the median is proposed

as part of the redesign of the intersection. These relocations would not disrupt the integrity of the trails and they would continue to serve a recreation function similar to that currently provided. A short-term impact may occur during construction of the improvement. Mitigation measures in the Traffic Section of the EIR include measures to address safety and potential rerouting during construction. With implementation of appropriate mitigation measures during construction, this improvement would not result in a significant impact, unto itself, nor would the off-site improvement, in combination with the Proposed Project, result in a significant impact after mitigation.

#### **4.0 MITIGATION MEASURES**

##### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- The proposed Project shall provide park space in an amount equivalent to not less than a total of 17.16 acres (3 acres per thousand residents). A minimum of 11.4 acres shall be provided (2 acres per thousand residents) within the Proposed Project; the remaining park space may be satisfied through provisions of additional park space within the adjacent Playa Vista First Phase Project or on land controlled or improved by the applicant and its affiliates (i.e., nearby off-site locations)
- Prior to the issuance of the temporary or permanent Certificate of Occupancy for each 455 residential units, two acres of parks shall be provided and improved within the Project site; and an additional acre of off-site parks shall be provided concurrently (i.e., three acres in total), per the provisions outlined in the preceding mitigation measure.
- Prior to the recordation of any phase of the tract map for the Proposed Project, the required on-site and off-site parks shall be identified, including improvement and maintenance responsibilities, satisfactory to the local Council Office.
- In addition to the provision of park space identified above, the Proposed Project shall be responsible for providing improvements for the parks within the Project with landscaping, hardscaping, walking, jogging and bicycle trails, children's play areas, recreational fields and other recreational facilities (i.e. basketball courts, skating rings, etc.), with an emphasis on active activities as appropriate. The cost of the park improvements shall not be less than and is not limited by the amount of fees that the Project would be required to pay under LAMC Section 17.12D as though the Proposed Project was not dedicating any land for parks.
- Prior to recordation of any phase of the tract map for the Proposed Project, the applicant shall submit to the Advisory Agency for approval, in consultation with the

Department of Recreation and Parks and the local Council office, a plan for the improvement of the parks to be provided by the Proposed Project.

- Prior to recordation of any phase of the tract maps, all parks within the Proposed Project in such tract map shall either be designated as active open space on such final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.
- Prior to recordation of tract maps, lots designated for parks in tentative maps shall be offered for dedication to the Department of Recreation and Parks. If the Department of Recreation and Parks does not accept dedication of the park areas, a property owners' association shall be formed to maintain the park and recreational facilities in a manner satisfactory to the City of Los Angeles, together with the appropriate trails and easements guaranteed to the City. The property owners' maintenance responsibility for the park/recreational facilities shall be recorded in a Conditions, Covenants and deed Restrictions (CC & R) and a Covenant and Agreement. Any Covenant and Agreement to maintain park, open space and recreational fields/facilities shall be reviewed by the City Attorney prior to its acceptance by the Advisory Agency. Said covenant and agreement shall be recorded at tract map recordation. The property owner's association shall enter into a usage agreement with the Department of Recreation and Parks if requested.

#### **Additional Mitigation Measure for the Equivalency Program**

- Additional park space shall be provided at the rate of 0.12 acres for every 50 assisted living units developed.

## **5.0 UNAVOIDABLE ADVERSE EFFECTS**

The Proposed Project would provide an increase in the level of park and open space in the existing area, increasing the per capita ratio service level set forth in LAMC Section 17.12. The Proposed Project would also meet the short and intermediate range goal of 2 acres per 1,000 population for community and neighborhood parks set forth in the PRP, would exceed the requirements of LAMC Section 17.12, and meet the demand for parks. No significant impacts are anticipated. This conclusion applies to the Proposed Project inclusive of the Equivalency Program and the construction of the Project's off-site improvements.

## 6.0 CUMULATIVE IMPACTS

The cumulative impacts analysis is based on the impacts of the Proposed Project, in combination with related projects within the City of Los Angeles 2-mile service radius. Of the 96 projects on the related projects list identified in Section III.B, ten are located within the service area and are residential in nature or have residential components. These include Related Projects 1, 3, 5, 24, 25, 37, 40, 44, 65 and 95.

The additional residential population for each of these related projects is forecasted in Table 110 on page 789 of the Section IV.J, Population, Housing and Employment. The total population for the ten related projects is 18,104. In addition, to this population, a residential “background” growth of 25% (i.e. 4,526) has been added to the total related residential projects since it is assumed that additional residential development, particularly projects involving less than 35 units, would not require discretionary approval by the City of Los Angeles and, thus would not appear on the related projects list.

The 5,720 residents for the Proposed Project, plus the 18,104 residents for all of the other related projects in the City of Los Angeles within a 2-mile radius of the Project perimeter and other related background growth of 4,526 residents are expected to generate a cumulative population increase of approximately 28,350 residents. Under the Project’s Equivalency Program, this number could increase by 240 to 28,790 residents. The park space requirement to meet the various standards for the additional population would be as follows: 57.6 acres to meet the PRP’s short and intermediate range standards for community and neighborhood parks of 2 acres per 1,000 residents; 86.4 acres to meet a 3-acre-per-1,000-resident standard per Quimby requirements, and 115.2 acres to meet the PRP’s long range goal of 4 acres per 1,000 residents, or in-lieu payments as applicable.

New park space to help meet future demand is included in four of the related projects used in the cumulative analysis of the EIR. Related Projects 14, 26, and 37A include 11 acres amongst them. Related Project 40, the Playa Vista First Phase Project, provides for the provision of a minimum 28.6 acres of active open space. The provisions of the new park space will contribute to attainment of the required needs and will improve the existing community service ratio.

Future related projects within the City would be subject to LAMC requirements for the provision of open space. However, it cannot be assured that all related projects within the City of Los Angeles would provide parks in accordance with the City’s parks standards. As such, other related project development could have significant impacts. However, contributions of the Proposed Project to the availability of park space after the proposed mitigation measures would meet demand for park provision, and therefore would not contribute to a significant adverse effect with regard to cumulative impacts. This conclusion is inclusive of the Proposed Project, the Equivalency Program and the construction of the Project’s off-site improvements.



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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**L. PUBLIC SERVICES**  
**(5) LIBRARIES**

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**1.0 INTRODUCTION**

This section addresses the potential impact of the Proposed Project on City of Los Angeles Public Library services and facilities. The analysis evaluates whether available library capacity is sufficient to accommodate the growth from the Proposed Project. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

**2.0 SETTING**

**2.1 Regulatory Framework**

The City of Los Angeles Public Library provides library services throughout the City of Los Angeles, including the Proposed Project site. City library policy is guided by the Public Libraries Plan, an element of the City of Los Angeles General Plan. The Public Libraries Plan guides the construction, maintenance, and operation of public libraries and specifies standards in defining geographic service areas and facility size.

The Los Angeles Public Library Branch Facilities Plan, adopted by the Board of Library Commissioners in August 1988 (revised February 1998), contains the required facilities expansion needs of the City Public Library system. According to the current Library Branch Facilities Plan, service criteria is based on the floor area required to serve varying amounts of residential population.<sup>445</sup> Current Los Angeles City branch building size standards are presented in Table 153 on page 1043.

The City of Los Angeles Public Library is a member of the Metropolitan Cooperative Library System, an association of public libraries in the greater Los Angeles area which shares

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<sup>445</sup> *Los Angeles Public Library, "Branch Facilities Plan: Site Selection Criteria," Board of Library Commissioners, Revised February 1998. Use of the residential basis was verified by Fontayne Holmes, Assistant Director of Branches, City of Los Angeles Public Library, telephone interview with PCR Services Corporation, February 3, 2003.*

Table 153

**CITY OF LOS ANGELES PUBLIC LIBRARY  
BRANCH BUILDING SIZE STANDARDS**

Population Served	Size of Facility
50,001-100,000	12,500 sq.ft.
35,001-50,000	10,500 sq.ft.
25,001-35,000	9,000 sq.ft.
under 25,000	Special Size

*Source: Los Angeles Public Library Branch Facilities Plan, adopted 1988, revised 1998.  
Los Angeles CEQA Thresholds Guide.*

resources to improve library service to the residents of all participating jurisdictions. The Library also participates with other library systems in “The Library of California,” a network of public and private California libraries. Participation in these programs allows individuals to use their library cards in multiple jurisdictions, and for member libraries to receive compensation for such use.<sup>446</sup>

## 2.2 Existing Conditions

This analysis addresses impacts on the Los Angeles Public libraries that are currently located or proposed for location within 2 miles of the Proposed Project sites.<sup>447</sup> There is currently one library operating within a 2-mile radius of the Proposed Project site. Prior to development of the Proposed Project, one new library and one replacement library, within this radius are expected to be open for service to the public. One is completed as of June 2003 and another is under construction. Construction for the new libraries is occurring pursuant to the 1998 Branch Facility Plan and the Construction Bond Program (Proposition DD), adopted November 1998. The Library Bond Program provides funding and oversight for the construction of 30 new library facilities plus the renovation and expansion of three existing library facilities. At this time, 17 projects are completed, ten are ahead of the Master Schedule, four projects are on schedule, and two projects are behind schedule.<sup>448</sup>

The libraries that currently serve and that are anticipated to serve the Project site are identified on Figure 94 on page 1044. Their size, service capacities, and service populations are

<sup>446</sup> For information regarding the Metropolitan Cooperative Library System, see <http://www.mcls.org/nonmembers/index.cfm>. For information regarding the “Library of California,” see <http://www.library.ca.gov/loc>.

<sup>447</sup> Per guidance in the *Methodology to Determine Significance, City of Los Angeles Draft CEQA Thresholds Guide*, page J.5-2.

<sup>448</sup> *Los Angeles Public Library, 1998 Library Bond Program, June 2003 Progress Report.*

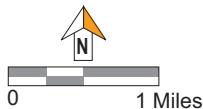
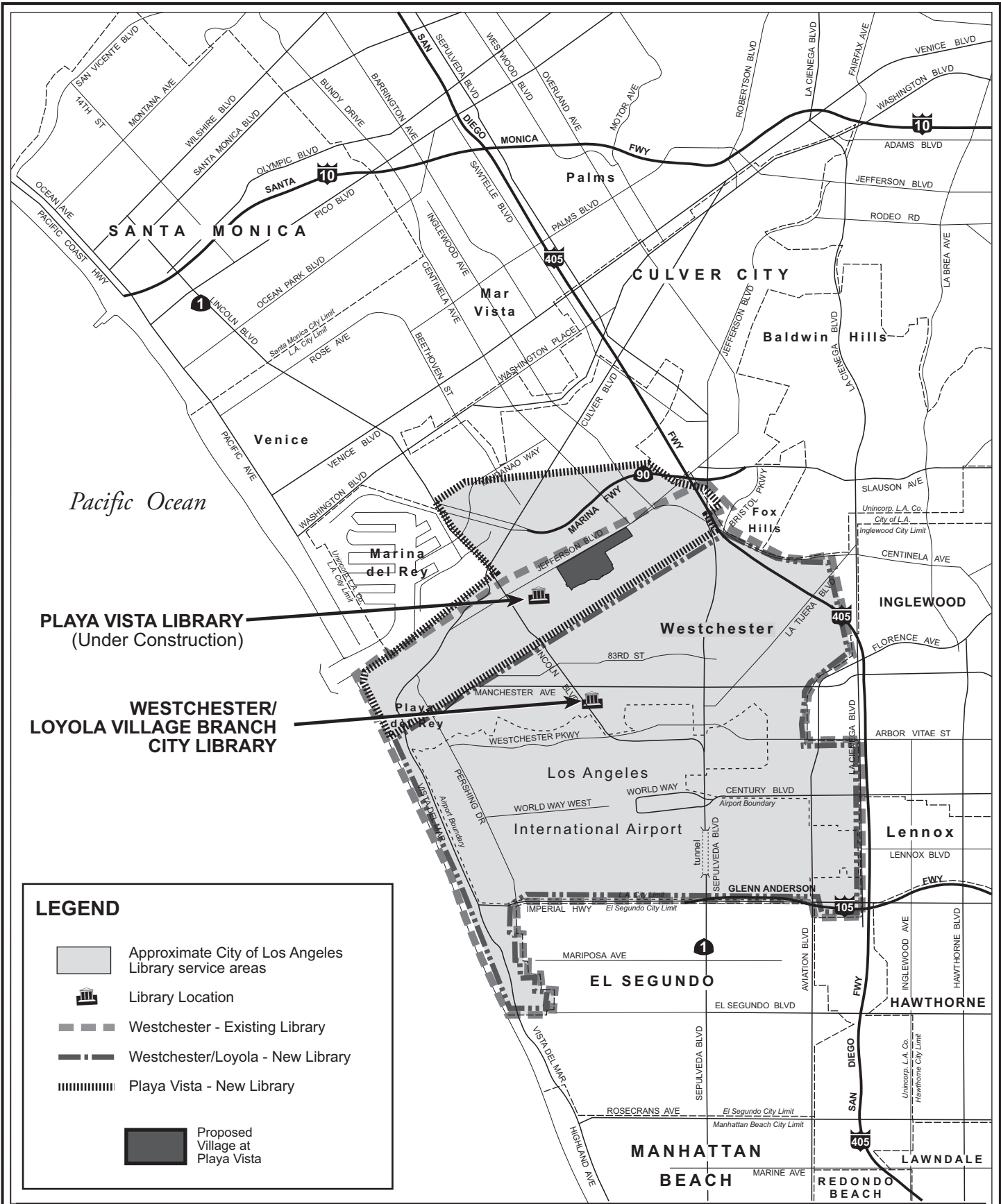


Figure 94  
Public Library Facilities  
in the Playa Vista Project Vicinity

Source: Los Angeles City Public Library, 1996

summarized in Table 154 on page 1046. Information regarding the existing and new libraries follows.

The entire collection and services of the Westchester Library that formerly served the area were moved to the new Westchester/Loyola Village Library, which opened on June 12, 2003.<sup>449</sup> The Westchester/Loyola Village Library is located at the site of the former Loyola Village Library, at 7114 W. Manchester Avenue in Westchester, approximately 1 mile south of the Proposed Project site. This library is 12,500-sq.ft., which is suitable for serving a population of 50,001 to 100,000 under the Library Branch Facilities Plan criteria. Construction of the facility was completed March 10, 2003 and the Grand Opening was held June 12, 2003.<sup>450</sup> The current population of this library's service area is 45,483. The service area for this library would include the same service area as the existing Westchester Branch library that is being replaced, minus the population that would be located closer to the Playa Vista library upon its completion.<sup>451</sup>

The Playa Vista library is located within the adjacent Playa Vista First Phase Project site (6400 S. Playa Vista Drive), approximately 0.4 mile west of the Proposed Project. This library is currently under construction and will provide the primary services to the Proposed Project. The library is located between Playa Vista Drive and Seaward Drive adjoining the First Phase community center to the north. The library is a 10,500-sq.ft. facility, suitable for serving a population of 35,001 to 50,000. Construction of the facility is scheduled for completion in early 2004. The existing population within the service area of this library location is 19,603 residents. This represents people currently living in areas adjacent to the Proposed Project site. This service population represents City residents residing within the halfway distance to the Venice and Mar Vista libraries to the north and the under-construction Westchester/Loyola Village Library to the south.

In addition to the City of Los Angeles Public Libraries within 2 miles of the Proposed Project, Loyola Marymount University operates the on campus Von der Ahe Library approximately 1/8 mile south of the Proposed Project site. The operation of this library reduces

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<sup>449</sup> Sam Tanaka, *Los Angeles Bureau of Engineering, Library Facilities Group, telephone communication, July 2, 2003.*

<sup>450</sup> *Los Angeles Public Library, 1998 Bond Program, June 2003 Progress Report.*

<sup>451</sup> *The service population for each of the libraries is based on an aggregation of estimated populations for the census tracts within the library's service area. Service area boundaries were determined by considering: (1) population residing within the City of Los Angeles; (2) such population as it extends south to the City boundary along Vista del Mar/Imperial Highway; (3) such population as it extends east to the City boundary that roughly follows the I-405 Highway; and (4) such population as it otherwise extends to the mid-point distance between the library and the next closest City library (e.g., Venice and/or Mar Vista Branches). Population data is based on the year 2000 census, adjusted to 2002 based on interpolation with future population forecasts reflected in SCAG forecasts developed to support their Regional Transportation Plan.*

Table 154

## CITY LIBRARY CAPACITY IN PROJECT VICINITY

Branch <sup>e</sup>	Current Facility Size	Existing Service Population <sup>a</sup>	Expansion Under Library Bond Program	Year of Completion <sup>b</sup>	Population Service Capacity Before Expansion	Population Service Capacity After Expansion
Playa Vista	N/A	19,603 <sup>c</sup>	10,500 sq.ft.	2004	N/A	35,001-50,000
Westchester/Loyola Village	12,500 sq.ft.	45,483 <sup>c</sup>	12,500 sq.ft.	Opened 6/12/03	Under 25,000	50,001-100,000
<b>Total</b>	<b>12,500 sq.ft.</b>	<b>56,553/65,086<sup>d</sup></b>	<b>23,000 sq.ft.</b>		<b>Under 25,000</b>	<b>85,002-150,000</b>

<sup>a</sup> The service population for each of the libraries is based on an aggregation of estimated populations for the census tracts within the library's service area. Service area boundaries were determined by considering: (1) population residing within the City of Los Angeles; (2) such population as it extends south to the City boundary along Vista del Mar/Imperial Highway; (3) such population as it extends east to the City boundary that roughly follows the I-405 Highway; and (4) such population as it otherwise extends to the mid-point distance between the library and the next closest City library (e.g., Venice and/or Mar Vista Branches). Population data is based on the year 2000 census, adjusted to 2002 based on interpolation with future population forecasts reflected in SCAG forecasts developed to support their Regional Transportation Plan. This represents people currently living in areas adjacent to the Proposed Project site.

<sup>b</sup> Los Angeles Public Library, 1998 Bond Program, June 2003 Progress Report.

<sup>c</sup> Currently under construction; completion expected in 2003, and early 2004.

<sup>d</sup> There are 65,086 within the service area of the combined Westchester/Loyola Village and Playa Vista Libraries (19,603 + 45,483).

<sup>e</sup> Westchester Library was closed upon completion of the Westchester/Loyola Village Library.

Source: PCR Services Corporation, 2002.

some of the demand on the Los Angeles Public Library system, but such reduction has not been included in this analysis. While Loyola Marymount University is a private institution, residents of the Proposed Project may include LMU students and LMU students live in housing near the Proposed Project area. Further, this library provides service to the general public on a fee basis.

### 3.0 PROJECT IMPACTS

#### 3.1 Methodology

The estimated residential population increase resulting from the Proposed Project is evaluated in relation to the capacity standards of the City of Los Angeles Public Library. The City Public Library capacity standards, contained in the 1998 Los Angeles Public Library Branch Facilities Plan, are based on the overall size of facility per residential population, as shown in

Table 153 on page 1043. This analysis focuses on impacts related to the Los Angeles Public Library facilities serving the Project site, which generally includes libraries within 2 miles.<sup>452</sup>

### 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p. J.5-2), states that the determination of the significance of library impacts shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for library services anticipated at the time of project buildout compared to the level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to demand; and
- Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

Based on these factors, the Proposed Project would have a significant impact on library facilities and services, if:

- The demand for library services would exceed the library capacity within the service area of the City's Branch Libraries located within 2 miles of the Proposed Project site.

### 3.3 Project Design Features

The Proposed Project would not include the development of any public or private library facilities on the Proposed Project site.

### 3.4 Project Impacts

#### 3.4.1 Proposed Project Impacts

The Draft Los Angeles CEQA Thresholds Guide identifies three factors to be used for determining the significance of a project's impacts on library services (see Subsection 3.2, above). The first and third factors are two components that contribute to the significance of a

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<sup>452</sup> *City of Los Angeles Draft CEQA Thresholds Guide, Page J.5.2, May 14, 1998.*

project's impact as they combine to identify a project's demand for City library services. The second factor, which includes this demand, identifies the components of the significance threshold. The second factor also indicates that Project impacts be analyzed at Project buildout relative to the services that would be available at that time. Notwithstanding, the State CEQA Guidelines indicate that the analyses presented in an EIR reflect the amount of impact relative to existing, rather than future, conditions.<sup>453</sup> Consistent with the direction set forth in the State CEQA Guidelines, the analysis of Project impacts presented in this section is based on the impact of the Project relative to existing conditions. Furthermore, an analysis pursuant to the second factor identified above (i.e., Project impacts at Project buildout relative to the library services that would be available at that time) is presented in Subsection 6.0, Cumulative Impacts.

The proposed urban development program would include up to 2,600 residential units that would generate new site population and related impacts on library services. The estimated population in these units is 5,720. The Habitat Creation/Restoration Component of the Proposed Project would generate no new population and would therefore have no effect on the provision of library services.

As illustrated in Table 154 on page 1046, the 1998 Proposition DD, Library Construction Bond Program, will increase library capacity to 85,002 to 150,000 residents in early 2004. The Proposed Project would be primarily served by the Playa Vista Library, located within the Playa Vista First Phase Project. The 10,500-sq.ft. Playa Vista Library will have the capacity to serve a population of 35,001 to 50,000. It will have the capacity to accommodate 40,000 to 70,000 library materials, consisting of books, magazines, tapes, CDs and records, with an opening day collection of approximately 25,000 items.<sup>454</sup> The estimated population increase associated with the Proposed Project would not exceed the capacity of the Playa Vista Library. There are currently 19,603 residents who would find the Playa Vista library closer than other libraries in the area. The total service population would be 25,323 residents (19,603 + 5,720), exclusive of some population that may use the Loyola Marymount University Library, a private facility. Relative to the capacity of the Playa Vista Library, Proposed Project development would not exceed the capacity of the library (35,001 to 50,000). No significant impacts on library facilities or services would occur as a result of the Proposed Project.

Population from the Proposed Project would combine with the existing service population in the service area analyzed, and to the extent that crossover between library service occurs, be a consideration in the adequacy of library services in a larger district context. As indicated in Table 154 on page 1046, the capacity of libraries in the area (not including the Loyola Marymount University Library, a private facility), after completion of the new facilities,

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<sup>453</sup> *California Environmental Quality Act, CEQA Guidelines, Article 9, Section 15125(a).*

<sup>454</sup> *Fontayne Holmes, Assistant Director of Branches, City of Los Angeles Public Library, e-mail correspondence to PCR Services Corporation, January 10, 2003.*

per the 1998 Los Angeles Public Libraries Branch Facility Plan, and funding under the Proposition DD Library Construction Bond Program, adopted in November 1998, is anticipated to be 85,002 to 150,000. The existing service population is 65,086. When combined with the population of the Proposed Project, 5,720, the service population would be 70,806. This service population does not exceed the lower end of the design capacity (85,002 to 150,000) for the Los Angeles libraries located within a 2-mile radius of the Proposed Project. Since the Proposed Project's contribution to the demand for library services would not exceed the capacity of the Playa Vista Library nor combined Playa Vista-Westchester/Loyola Libraries, the Project's impacts on library services would be less than significant. If the library expansion currently under construction is not completed, capacities could be exceeded by existing and/or new population.

### **3.4.2 Equivalency Program Impacts**

The preceding analysis addressed potential impacts on the capacity of libraries serving the Proposed Project site. As indicated, the Proposed Project would have a residential population of 5,720 residents. The total service population for the Playa Vista Library, inclusive of the Proposed Project, would be 25,323, well below the library's capacity of 35,001 to 50,000 residents. The total service population for the combined Playa Vista-Westchester/Loyola Libraries, inclusive of the Proposed Project, would be 70,806, well below their capacity of 85,002 to 150,000 residents.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. However, the exchange in the land uses would alter the Project site's residential population for two of the Equivalency Scenarios.

As described in Section IV.J, Population, Housing and Employment, the All Assisted Living and Retail/Assisted Living Scenarios would increase the site population to 5,960 residents. This increase of 240 additional residents would be well below the remaining capacity for the Playa Vista Library and the joint Playa Vista-Westchester/Loyola Library service areas, 9,678 residents, and 14,196 residents, respectively. The demand for library services under the Equivalency Program would not exceed the capacity, and impacts on library services, as is the case with the Proposed Project, would be less than significant.

### **3.4.3 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical



improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These infrastructure improvements would reduce the traffic and water utility impacts of the Proposed Project. They would not add new population to the area. Therefore, they would not increase the demand for library services, beyond the demand identified in the above analyses. Impacts of the Proposed Project on library services, inclusive of the off-site improvements, would be less than significant.

#### **4.0 MITIGATION MEASURES**

The Proposed Project would not result in a significant impact on library services. Existing, recently completed, and under-construction libraries including the new Playa Vista Library would be sufficient to meet future library needs associated with the Proposed Project. Mitigation measures are not required or recommended for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

#### **5.0 UNAVOIDABLE ADVERSE IMPACTS**

New Project population would increase the demand for library services, but would not cause the capacity of any libraries within 2 miles of the Proposed Project site to be exceeded. Impacts would be less than significant. This conclusion is inclusive of the Project's Equivalency Program and construction of the off-site improvements.

#### **6.0 CUMULATIVE IMPACTS**

The cumulative impact analysis combines all of the known residential projects within the respective service areas of the analyzed libraries, as presented in Figure 94 on page 1044. The estimated population growth within the library service area is presented in Table 155 on page 1051. The related projects included in the table represent the residential components of related projects as presented in the list of Related Projects described in Section III.B of the EIR. Of the 96 related projects listed in Section III.B, seven are located within the combined library service area. Of the seven, one related project (Project 40, Playa Vista First Phase) is located within the service area of the Playa Vista Library. The remaining six (Related Projects 3, 5, 10, 24, 25, and 95) are located within the Westchester/Loyola Village Library Service area. As indicated in

Table 155

## CUMULATIVE POPULATION GROWTH IN THE LIBRARY SERVICE AREAS

Map Number	Project Name <sup>a</sup>	Land Use	Dwelling Units/ Floor Area	Factor	Residents <sup>b</sup>
<b>Related Project in the Playa Vista Library Service Area Boundary</b>					
40	Playa Vista First Phase	Residential	3,246 units		7,171 <sup>c</sup>
<b>Related Projects in the Westchester/Loyola Village Service Area Boundary</b>					
3	8000 Manchester Avenue	Apartment	246 units	2.36 <sup>d</sup>	581
5	Decron Project	Apartment	547 units	2.36 <sup>d</sup>	1,291
10	Pershing/Manchester	Apartment	49 units	2.36 <sup>d</sup>	116
24	West Bluff	Single Family Homes	120	2.36 <sup>d</sup>	283
25	LMU Expansion	Residential	420,000 sq.ft.	0.0022 <sup>e</sup>	924
95	Pershing/Talbert	Apartment	305 units	2.36 <sup>d</sup>	720
<b>Subtotal Westchester/Loyola Village Library Service Area Boundary</b>					3,915
<b>Total – All Related Projects</b>					11,086
<b>Background Growth Factor</b>					
Background Residential Growth		25% of Population (0.25 of 11,086)			2,772
<b>Proposed Project</b>					
Proposed Project		Residential	2,600 units	2.20	5,720 <sup>f</sup>
<b>Cumulative Total</b>					19,578 <sup>f</sup>

<sup>a</sup> Related projects consists of residential projects found within the library service area. See Section III.B of the EIR for the entire list of related projects.

<sup>b</sup> Assumes a 100 percent occupancy rate.

<sup>c</sup> Data reflects that presented in the Playa Vista Phase I FEIR, May 1993, and Playa Vista Entertainment, Media and Technology District MND/EIR Addendum, August 1995.

<sup>d</sup> Average number of residents per household, based on SCAG 2010 projections, within the District Plan boundaries of Palms-Mar Vista-Del Rey and Westchester-Playa del Rey.

<sup>e</sup> Assuming 900 sq.ft./room and two persons per room, the factor would be 0.0022 students per sq.ft.

<sup>f</sup> Under the Equivalency Program, the site population could increase by 240 residents to a total of 5,960 residents. The cumulative population would increase to 19,818.

Source: PCR Services Corporation, 2002.

Table 155, the population from the related projects within the Playa Vista Library Service Area would be 7,171. The cumulative population increase within the Westchester/Loyola Village Library Service area would be 3,915. The total cumulative population increase from the related projects would be 11,086. In addition, a residential “background” growth of 25 percent is added to the total related residential projects since it is assumed that additional residential development within each library's service area, particularly projects involving less than 35 units, would not require discretionary approval and, thus would not appear on the related projects list. All residential development within the cumulative impact study area, including the Proposed Project, would result in a population increase of 19,578. Under the Proposed Project’s Equivalency Program, the cumulative population would increase to 19,818.

As shown in Table 154 on page 1046, the City public library capacity within the local service area would be 85,002 to 150,000. This capacity includes the Westchester/Loyola Village and Playa Vista Libraries. The current service population is 65,086. Adding all of the cumulative residential population increase to the existing library service population, the total population would be 84,664 (65,086 + 11,086 from related projects, 2,772 from background growth and 5,720 from the Proposed Project). The cumulative increase would not exceed the anticipated capacity of the Los Angeles Public Branch Libraries in the local service area (85,002 to 150,000). Under the Proposed Project's Equivalency Program, the population could increase to 84,904, still below the capacity. The only related Project within the boundaries of the Playa Vista Branch Library is the First Phase Project. Its population of 7,171, plus a 25 percent growth factor, the Proposed Project and the existing service population would be 34,287 (7,171 + 1,793 + 5,720 + 19,603). This population would not exceed the capacity of the Playa Vista Branch Library, and would, in fact, be less than the lower range capacity of the Playa Vista Library of 35,001. Under the Equivalency Program, the population could increase to 34,527, still below the capacity.

The cumulative development would not exceed the capacity of the Los Angeles public libraries within a 2-mile radius of the Proposed Project site and, therefore, would not significantly impact City of Los Angeles Public Library facilities or services. Further, the cumulative population within the service area of the Playa Vista library would not exceed its capacity, and no significant cumulative impacts on the Playa Vista Branch Library would occur. This conclusion is inclusive of the Project's Equivalency Program and construction of off-site improvements.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### M. ENERGY

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#### 1.0 INTRODUCTION

This section addresses the potential impacts of the Proposed Project with regard to energy consumption during construction and operation of the Project. The analysis identifies the utility companies that provide electricity and natural gas services to the Proposed Project site, describes the existing consumption of electricity and natural gas at the site, indicates the nature and location of related infrastructure in the local area, and estimates the electricity and natural gas demands of the Proposed Project at buildout. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

#### 2.0 ENVIRONMENTAL SETTING

##### 2.1 Regulatory Framework

The California Public Utilities Commission (CPUC) regulates investor-owned electric power and natural gas utility companies in the State of California. Assembly Bill 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities (e.g., Southern California Edison [SCE]) is being decoupled.

The deregulation requirements do not apply to public-owned utilities such as the Los Angeles Department of Water and Power (LADWP), which supplies power to the Proposed Project site, unless the public-owned utility were to decide by a later time to enter the free market of investor-owned utilities. If a public-owned utility so chooses, the transition to buy/sell power on a free-market basis must be completed within 10 years. As of November 2002, LADWP has no plans to deregulate its electrical service utility.<sup>455</sup>

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<sup>455</sup> Sandberg, Meryl. Staff Assistant to Henry Martinez, Assistant Vice President of Generation and Project Planning for Electrical Generation, City of Los Angeles Department of Water and Power. Personal Communication. November 8, 2002.

All new construction in the State of California is subject to the energy conservation standards set forth in Title 24, Part 6, Article 2 of the California Administrative Code. These are prescriptive standards which establish maximum energy consumption levels for the heating and cooling of new buildings.

The utilization of alternative energy applications in development projects (including the Proposed Project), while encouraged, is not required as a development condition. Such applications may include installation of photovoltaic solar panels, active solar water heating systems, or integrated pool deck water heating systems, all of which serve to displace consumption of conventional energy sources (i.e., electricity and natural gas). Incentives, primarily in the form of state and federal tax credits, as well as reduced energy bills, provide a favorable basis for individual builders, property owners, and occupants to install such alternative energy systems.

## **2.2 Existing Conditions**

### **2.2.1 Energy Supply and Demand**

#### **2.2.1.1 Electricity**

The largest single source of power supply for LADWP is coal, which provides 55 percent of the City's energy. Oil and natural gas provide about 20 percent of the City's energy; hydroelectricity accounts for about 4 percent; nuclear, 10 percent; and the remainder (11 percent) comes from purchased power. The sources of coal-fired power production are three coal-fired power plants located outside California, in which LADWP owns an equity interest. The greatest amount of coal-fired power is received from the Intermountain Generating Station near Delta, Utah. About one-fifth of LADWP's power production is received from the Mohave Power Plant in southern Nevada and the Navajo Power Project near Page, Arizona. Of the four power plants producing energy from oil and natural gas located within the Los Angeles Basin, the largest is the Haynes Generating Station in Long Beach. The other plants are the Valley, Harbor, and Scattergood generating stations.

The two primary hydroelectric power plants serving the City are Hoover Dam, on the Colorado River, and Castaic Power Plant, on the California State Aqueduct, about 22 miles north of the City. In addition, hydroelectric power is derived from several smaller Los Angeles Aqueduct stations, as well as purchased from other producers, mainly the Columbia River Power System. Nuclear power has been a source of electricity for the City since 1986, from the Palo Verde Nuclear Generating Station near Phoenix.

LADWP has 21 receiving stations, designed to handle large quantities of bulk power from the major transmission lines connected to the power generating plants in California and neighboring states. The receiving stations lower the voltage of electricity to subtransmission levels, sending the power on to 120 distributing stations in the City. The distributing stations either serve a large manufacturing or commercial center directly or, as in most cases, they each supply a five- to ten-square mile area for residential and business consumers. The distribution stations reduce the voltage from 34,500 to 4,800 volts for efficient distribution of electricity to local transformers. The local distribution system consists of 6,100 miles of overhead pole-lines and 2,200 miles of underground cable.

According to the California Energy Commission, in 2000, LADWP customers consumed 24,223 gigawatt-hours (GWh) (a gigawatt-hour is equal to 1,000 megawatt-hours [MWh]).<sup>456</sup> To accommodate future needs, LADWP prepares 10-year and 20-year plans. The 10-year plan, updated annually, forecasts demand, distribution, and transmission needs to maintain system integrity. The 20-year plan, known as the Integrated Resources Plan, also updated annually, forecasts resource needs based on demand projections. The power system is designed to accommodate the maximum peak load of the City, which far exceeds the needs of any one project. In addition, the Electrical Infrastructure Systems Element of the General Plan indicates where major transmission facilities are anticipated.

Beginning in December 2000, reserves for electricity supply serving California fell to very low levels, resulting in “rolling blackouts” (i.e., temporary power outages) in portions of the state. While several factors have been identified as contributing to the energy shortage, the major causes are considered to be economic in nature, tied largely to how the energy market has responded to utility deregulation in California. Private utilities, such as SCE, operating in a deregulated energy market, encountered increased difficulties in purchasing power from energy suppliers. Following Governor Gray Davis’ declaring a state of emergency regarding the provision of electricity to consumers in California, the CPUC, legislative branch, and other branches/functions began working on plans and provisions to address California’s energy situation. Some utilities, such as the LADWP, that are not operating under deregulation, did not encounter the difficulties described above and, in fact, maintained energy supplies above the levels of demand. Furthermore, during the statewide energy shortage, LADWP not only met its electricity supply obligations for its customers, but aided other California utilities by selling its surplus power, thereby minimizing rolling blackouts in other areas of the state.<sup>457</sup> LADWP continues to maintain current and develop new (including alternative) energy supplies to ensure that future demands will be met well into the future. As most of the Proposed Project site is

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<sup>456</sup> *California Energy Commission*. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.

<sup>457</sup> *California Energy Commission*. 2002-2012 Electricity Outlook Report. February 2002.

vacant land, relatively little energy is currently being consumed. There are two buildings located within the Proposed Project site, Building 22 and Building 45, which are buildings that remain from the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant, as well as various other small buildings (sheds, minor storage structures, and construction trailers). Building 22 is a warehouse and as such consumes nominal quantities of energy. Building 45 consists of 43,489 square feet and is presently vacant; hence, it also consumes nominal quantities of energy. These two buildings are used intermittently for filming and other short-term activities (e.g., production-related activities and storage). The sheds, storage structures, and construction trailers use small amounts of electricity for lighting, but do not consume any natural gas or other fuels for normal operations. Between December 2001 and November 2002, the average monthly electricity consumption on-site was 577 kilowatt-hour (kWh).<sup>458</sup>

Relative to future baseline conditions anticipated to occur at the time of project buildout (2010), the California Energy Commission projects that annual electricity demand within the LADWP service area in 2010 will be 26,906 GWh.<sup>459</sup> No substantial change in on-site electricity consumption is anticipated for potential future conditions because no notable change in existing uses within the subject area is likely to occur relative to expected 2010 conditions (i.e., future conditions on-site without Proposed Project development). Off-site electricity consumption by 2010 in nearby areas will increase primarily due to the development of the adjacent Playa Vista First Phase Project.

### 2.2.1.2 Natural Gas

Southern California Gas Company (SCGC) provides natural gas service to much of Southern California, including the Los Angeles Metropolitan area. During 2000, SCGC customers consumed approximately 793.9 billion cubic feet of natural gas.<sup>460</sup> Natural gas is not consumed by any of the existing structures (Buildings 22 and 45 and the other small buildings, discussed above) on the Proposed Project site. The two buildings are currently vacant, but are used intermittently for various temporary activities (e.g., filming, production-related activities, and storage), although no natural gas is consumed.

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<sup>458</sup> *Electricity consumption is based on utility bills from LADWP for the 3 on-site meters, averaged over the months of December 2001 and January, February, March, April, May, June, July, and November 2002. Bills provided by Playa Capital Company.*

<sup>459</sup> *California Energy Commission. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.*

<sup>460</sup> *California Energy Commission. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.*

Projected annual demand for natural gas within the SCGC service area in 2010 will be approximately 883.4 billion cubic feet.<sup>461</sup> No substantial change in on-site natural gas consumption is anticipated for potential future conditions because no notable change in existing uses within the subject area is likely to occur by 2010, relative to future baseline conditions anticipated at the time of project buildout. Off-site natural gas consumption in nearby areas will increase by 2010 due to the development of the adjacent Playa Vista First Phase Project.

## **2.2.2 Transmission Facilities**

### **2.2.2.1 Electricity**

Until recently, a 66-kilovolt (kV) SCE transmission line ran approximately from the intersection of Jefferson and Centinela Boulevards south to the bluffs where it continued south as an overhead line. This line was taken out of service a few years ago, but is currently in the planning/engineering process with relocation/interring (placed underground) to begin in conjunction with construction of “the Campus” portion of the adjacent Playa Vista First Phase Project, although the easement still exists in the location where the line formerly operated (this easement will not be used to serve the Proposed Project). A very small portion of the relocated line will cross the easternmost portion of the Proposed Project site, and will be placed underground. LADWP overhead and underground 34.5- and 4.8-kV facilities also exist adjacent to the Proposed Project site. The existing 34.5- and 4.8-kV lines share similar alignments along Jefferson Boulevard.<sup>462</sup> From the Lincoln/Jefferson intersection east to the Beethoven/Jefferson intersection, the lines are underground; east of the Beethoven/Jefferson intersection, the lines are above ground.

### **2.2.2.2 Natural Gas**

SCGC has several high-pressure gas transmission lines located along Jefferson Boulevard. Mains range from 2 to 36 inches in diameter. In addition, a 6-inch diameter service line extends into the Proposed Project site from Jefferson and Centinela Boulevards adjacent to the eastern portion of the Proposed Project site and currently provides gas to the adjacent Playa Vista First Phase Project site.

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<sup>461</sup> *California Energy Commission*. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.

<sup>462</sup> *City of Los Angeles Department of City Planning, First Phase Project for Playa Vista, FEIR, May 1993.*



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### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

The Proposed Project would result in energy consumption from Project operations (natural gas and electricity consumption by land uses). Energy consumption estimates for long-term operations of the uses proposed in the Proposed Project are based on factors contained in the South Coast Air Quality Management District's (SCAQMD's) CEQA Air Quality Handbook (April 1993). The estimates include operational use of energy, such as electricity and natural gas consumption. Land use data used in calculating long-term operational energy consumption was provided by the Applicant.

#### 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p. K.4-3) states that the determination of significance regarding energy consumption shall be made on a case-by-case basis considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Based on these factors the Proposed Project would have a significant impact if:

- The Project would result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities.
- The design of the Project fails to incorporate energy conservation measures that go beyond the City's requirements.

#### 3.3 Project Design Features

Although not required by the City or other regulatory agency, the Applicant has committed to several measures that would reduce energy consumption through its Residential Sustainable Performance Guidelines (Appendix M-1 of this EIR). These measures include proposed building packages that will save an estimated 28 percent more energy than required by

the 1998 California Title 24 Building Energy Efficiency Standards (this figure does not include the substantial savings potential of energy efficient appliances).<sup>463</sup> In addition, improved energy efficiency and conservation measures will be integrated into the Proposed Project:

- The Applicant and builders will consult with the LADWP and SCGC to maximize gains in building design efficiency & reduce building energy requirements to the extent feasible. Technologies and site design features to be considered include high performance glass (low-e & heat mirror), increased R value insulation, natural ventilation strategies, solar building orientation, daylighting strategies & shade tree planting, which will be incorporated into the final building plans to the extent feasible.
- All buildings will employ passive heating and cooling design strategies to the extent feasible. Strategies to be considered include orientation; natural ventilation, including cross-ventilation in residential units; high insulation values, energy efficient windows including high performance glass; daylighting (in commercial buildings); light-colored or high-albedo (reflective) roofing and exterior walls; window shading; and landscaping that provides shading during the appropriate seasons, especially of the south and west exposures.
- All buildings will utilize energy efficient mechanical and electrical systems to the extent feasible. Strategies to be considered in commercial buildings include efficient heating, ventilation and air conditioning (HVAC) equipment; variable air volume systems; air economizer cycles that utilize 100 percent outside air when appropriate; under floor air distribution; and building control systems for lighting, HVAC and other systems. Strategies to be considered in residential buildings include fans to assist natural ventilation; centralized water and space conditioning systems; high efficiency individual heating and cooling units; and automatic setback thermostats.
- Solar systems will be installed to supplement the heating of all swimming pools as well as hot tubs when provided together with swimming pools, to the extent feasible.
- All residential buildings will be equipped with Energy-Star rated appliances, where applicable.
- Energy efficient lighting, which exceeds the California Title 24 Energy Efficiency standards to the extent feasible, will be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are

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<sup>463</sup> *Playa Vista, Residential Sustainable Performance Guidelines, March 18, 1999.*

not needed will also be used to regulate interior lighting for office common spaces, such as conference rooms and bathrooms.

- All fixtures used for exterior lighting of common areas will be regulated by automatic devices to turn off lights when they are not needed. Energy efficient exterior lighting fixtures, as might be specified by the LADWP, will be used to the extent such lighting is available and feasible.
- All residential and commercial buildings will be equipped with electric vehicle charging stations to the extent required by the California Air Resources Board at the time of construction of the given building.
- Shade producing trees will be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.
- All buildings will employ passive heating and cooling design strategies to the extent feasible.
- All buildings will be designed to accommodate renewable energy sources, to the extent feasible.

### **3.4 Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies three factors to be used in determining the significance of a project's impacts on energy (see Subsection 3.2, above). The first and third factors have been established as the Proposed Project's significance thresholds. The second factor is a component of the first factor/significance threshold in that it provides additional guidance in terms of describing the infrastructure that would be available to meet the Project's energy needs

The following analysis evaluates impacts of the Proposed Project. Because the Habitat Creation/Restoration Component would consume negligible amounts of energy resources during implementation, the Proposed Project's impacts result from the implementation of the Urban Development Component.

#### **3.4.1 Construction Impacts**

Because the construction of the Proposed Project would only consume minimal quantities of electricity (i.e., temporary use for lighting, construction trailer office equipment, small power tools, etc.) and is not anticipated to consume natural gas, construction impacts to energy resources would not result in an increase in demand for energy that exceeds available supply or

distribution infrastructure capabilities. As such, construction impacts would be less than significant.

### 3.4.2 Operational Impacts

Operation of proposed uses would consume an estimated total of 53.01 megawatt hours (MWh) of electricity per day and 484.73 thousand cubic feet (kcf) of natural gas per day, as indicated in Table 156 on page 1062. Electrical service within the LADWP service area has not been affected by the recent statewide energy shortage, and LADWP is projected to have an annual demand of 26,906,000 MWh at Project buildout in 2010, as discussed above in Subsection 2.2.1.1, Electricity.<sup>464</sup> In contrast to this annual demand, the Project-related annual electricity demand of 19,400 MWh at buildout is 0.07 percent of the total demand, and is within the anticipated service capabilities of LADWP. The natural gas consumption for Project-related development at buildout is estimated to be 176.9 million cubic feet annually. Relative to the projected annual demand of 883,400 million cubic feet (as discussed above in Subsection 2.2.1.2, Natural Gas) within the entire SCGC service area in 2010, the consumption of natural gas associated with the Proposed Project is 0.02 percent and is within the service capabilities of SCGC.<sup>465</sup>

The projected electricity and natural gas consumption from operation of uses proposed under the Proposed Project are within the anticipated service capabilities of LADWP and SCGC. Current transmission and distribution facilities for electricity and natural gas are adequate to meet the demands of the Proposed Project, though if any facilities improvements were necessary to meet future demand, LADWP and SCGC are prepared to provide these at any time (see Appendices M-2 and M-3 of this EIR for correspondence from utility companies).<sup>466, 467</sup> The operation of the Proposed Project would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities; hence, no significant impacts are expected.

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<sup>464</sup> *California Energy Commission*. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.

<sup>465</sup> *California Energy Commission*. California Energy Outlook: Electricity and Natural Gas Trends Report – Staff Draft. Docket #200-01-002. September 7, 2001.

<sup>466</sup> *Gragg, Alfred W., District Engineer, City of Los Angeles Department of Water and Power, Metropolitan Service Planning (West)*. Personal Communication: Will-Serve Letter Re: “Village at Playa Vista, Lincoln & Jefferson Boulevards”. May 14, 2003.

<sup>467</sup> *Jovani, Gayle, Southern California Gas Company, Pacific Region*. “Will-Serve Letter for Village at Playa Vista Project”. Personal Communication. June 6, 2003.

Table 156

**PROPOSED PROJECT  
DAILY ELECTRICITY AND NATURAL GAS USAGE – PROJECT OPERATION**

Land Use	Proposed Project	Daily Electricity Usage (in MWh)		Daily Natural Gas Consumption (in kcf)	
		Electricity Consumption Factor <sup>a</sup>	Projected Electricity Consumption <sup>c</sup>	Natural Gas Consumption Factor <sup>b</sup>	Projected Natural Gas Consumption <sup>c</sup>
Residential (d.u.)	2,600	5,626.5 kWh/d.u./yr	40.08	5,338 cf/du/mo	456.29
Office (ksf)	175	12.95 kWh/ksf/yr	6.21	2,000 cf/ksf/mo	11.51
Retail (ksf)	150	13.55 kWh/ksf/yr	5.57	2,900 cf/ksf/mo	14.30
Civic/Institutional (ksf)	40	10.5 kWh/ksf/yr	1.15	2,000 cf/ksf/mo	2.63
<b>Total</b>			<b>53.01</b>		<b>484.73</b>

All consumption numbers presented in this table are prior to application of Project Design Features, which would substantially reduce these projected consumption values.

ksf = thousand square feet  
MWh = megawatt-hour

du = dwelling units  
c.f. = cubic feet

kWh = kilowatt-hour  
kcf = thousand cubic feet

<sup>a</sup> Electricity consumption factors based on Table A9-11-A of SCAQMD CEQA Air Quality Handbook (April 1993). Daily Values derived from annual factors (divided by 365 days).

<sup>b</sup> Natural gas consumption factors based on Table A9-12-A of SCAQMD CEQA Air Quality Handbook (April 1993). Monthly consumption factors used then multiplied by 12 months and divided by 365 days for daily values (~30.41 days/month).

<sup>c</sup> Projected consumption calculated by multiplying derived daily factor by land use statistics (i.e., number of dwelling units or thousand square feet, as applicable).

Source: Camp Dresser & McKee, 2003.

The electricity and natural gas demand estimates presented above for the Proposed Project at buildout are based on consumption factors presented in the 1993 SCAQMD CEQA Air Quality Handbook, which do not take into account the energy conservation measures that are described in Subsection 3.3, Project Design Features. As described therein, the energy conservation measures that will be incorporated into the design and operation of the Proposed Project will exceed (i.e., will be better than) the energy conservation standards set forth by the state; therefore, the actual electricity and natural gas demands of the Proposed Project are anticipated to be less than estimated above. As such, the design of the Proposed Project incorporates energy conservation measures that go beyond the City's requirements (i.e., meet state Title 24 energy conservation standards); hence the Proposed project would have a less-than-significant impact.

In summary, the electricity and natural gas consumption demands estimated for the Proposed Project at buildout are not expected to exceed available supplies or distribution infrastructure capabilities. Additionally, numerous energy conservation measures that go beyond the City's requirements would be incorporated into the design and operation of the Project.

Mitigation measures are proposed below to require implementation of the Project Design Features, which serve to eliminate potential significant impacts discussed above. As such, the Proposed Project would not result in significant impacts related to energy.

### **3.5 Equivalency Program Impacts**

The preceding energy analysis addressed impacts associated with construction and operation of the Proposed Project relative to projected energy consumption, as well as the adequacy of electricity and natural gas supplies and distribution infrastructure. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

Energy impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased electricity and natural gas consumption impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to distribution infrastructure under the Equivalency Program would be similar to the Proposed Project, as coordination with affected utilities (i.e., LADWP and SCGC) for design and planning of electricity and natural gas distribution infrastructure under the Equivalency Program (i.e., to ensure system adequacy) would still occur. As such, construction impacts, as well as operational impacts related to distribution infrastructure, would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since, with coordination with the utility providers, the total estimated energy demand for construction activities would not exceed available energy supplies, and operation of proposed uses would not exceed the capacity of distribution infrastructure.

Operational electricity and natural gas consumption under the Equivalency Program would, under some development scenarios (i.e., variations in office, retail, and assisted living development patterns, while residential and community-serving would be unchanged), result in greater energy supply impacts than under the Proposed Project. As shown in Table 157 on page 1064 and Table 158 on page 1065, electricity and natural gas consumption would increase under two of the three analyzed Equivalency Scenarios. The first scenario under the Equivalency Program (i.e., All Retail), in which no assisted living units would be developed and the reduced office uses would be transferred to retail development, would consume 40,089.8 kWh per day of electricity, which represents an almost negligible decrease of approximately 2.3 kWh (0.006 percent decrease) from Proposed Project consumption. Natural gas consumption would be 481.93 kcf per day under the first scenario, which represents a decrease of approximately 2.8 kcf per day (0.6 percent decrease) from Proposed Project consumption. Under the second scenario (i.e., All Assisted Living), in which retail uses would be equal to those under the

Table 157

## ELECTRICITY CONSUMPTION – PROPOSED PROJECT AND EQUIVALENCY SCENARIOS

Land Use	Consumption Factor (kWh/unit/yr)	Equivalency Scenario: All Retail		Equivalency Scenario: All Assisted Living		Equivalency Scenario: Retail/Assisted Living	
		Amount of Development	Consumption	Amount of Development	Consumption	Amount of Development	Consumption
<b>Daily Electricity Consumption (kWh)</b>							
Residential (d.u.)	5,626.5	2,600	40,079.2	2,600	40,079.2	2,600	40,079.2
Office (ksf)	12.95	50	1.8	150.90	5.4	50	1.8
Retail (ksf)	13.55	206.832	7.7	150	5.6	195.877	7.3
Community Serving (ksf)	10.5	40	1.2	40	1.2	40	1.2
Assisted Living (units/rooms)	5,626.5	0	0.0	200	3,083.0	200	3,083.0
<b>Total</b>			<b>40,089.8</b>		<b>43,174.3</b>		<b>43,172.4</b>
Proposed Project			40,092.1		40,092.1		40,092.1
<b>Over/(Under) Proposed Project</b>			<b>(2.3)</b>		<b>3,082.2</b>		<b>3,080.3</b>

kWh = kilowatt-hour

ksf = thousand square feet

d.u. = dwelling unit

Source: Camp, Dresser &amp; McKee, Inc., 2003.

Proposed Project, yet in which the maximum number of assisted living units would be constructed and office uses would be reduced, electricity and natural gas consumption would be increased over that which would occur under the Proposed Project. As Table 157 illustrates, the All Assisted Living scenario would result in consumption of 43,174.3 kWh per day, which represents an increase of 3,082.2 kWh per day (7.7 percent increase) over the Proposed Project. As indicated in Table 158 on page 1065, natural gas consumption under this scenario would be 518.24 kcf per day, which is an increase of 33.51 kcf per day (6.9 percent increase) relative to Proposed Project consumption. The analysis of the Equivalency Program also considered other equivalency scenarios in which some proportion of assisted living units and retail development would be constructed while office uses would be minimized (as in the first scenario). Under these equivalency scenarios, energy consumption would vary depending on the amount of retail and assisted living units constructed. Based on an analysis of a number of different equivalency scenarios, the greatest energy consumption would occur when the maximum number of assisted living units (i.e., 200 units) are constructed, along with additional retail uses (i.e., 45,877 sq.ft.) due to the fact that assisted living units are more energy-intensive than retail uses. As such, as illustrated in Table 157, the electricity consumption under the Retail/Assisted Living scenario of the Equivalency Program would be 43,172.4 kWh per day, which represents an increase of 3,080.3 kWh per day (7.7 percent increase) over the Proposed Project. Additionally, as indicated

Table 158

## NATURAL GAS CONSUMPTION – PROPOSED PROJECT AND EQUIVALENCY SCENARIOS

Land Use	Consump- tion Factor (kcf/unit/ month)	Equivalency Scenario: All Retail		Equivalency Scenario: All Assisted Living		Equivalency Scenario: Retail/Assisted Living	
		Amount of Develop- ment	Consump- tion	Amount of Develop- ment	Consump- tion	Amount of Develop- ment	Consump- tion
<b>Natural Gas</b>							
<b>Consumption (kcf)</b>							
Residential (d.u.)	5,338	2,600	456.289	2,600	456.289	2,600	456.289
Office (ksf)	2,000	50	3.288	150.90	9.922	50	3.288
Retail (ksf)	2,900	206.832	19.720	150	14.301	195.877	18.675
Community Serving (ksf)	2,000	40	2.630	40	2.630	40	2.630
Assisted Living (units/rooms)	5,338	0	0.000	200	35.099	200	35.099
<b>Total</b>			<b>481.927</b>		<b>518.242</b>		<b>515.982</b>
Proposed Project			484.728		484.728		484.728
<b>Over/(Under) Proposed Project</b>			<b>(2.801)</b>		<b>33.514</b>		<b>31.254</b>

Notes: kcf = thousand cubic feet ksf = thousand square feet d.u. = dwelling unit

Source: Camp, Dresser & McKee, Inc., 2003.

in Table 158, the natural gas consumption under the Retail/Assisted Living scenario of the Equivalency Program would be 515.98 kcf per day, which is an increase of 31.25 kcf per day (6.5 percent increase) over the Proposed Project.

Overall, based on the fact that, compared to the Proposed Project, the fluctuations in electricity and natural gas consumption under all development scenarios of the Equivalency Program are equal to or less than 7.7 percent, the impacts relative to the Proposed Project are not substantial. Furthermore, implementation of applicable Project Design Features (as discussed above in Subsection 3.3, Project Design Features) and Project mitigation measures would minimize energy consumption to the maximum extent practicable. As such, the total estimated electricity and natural gas demand at buildout would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities, and the development under the Equivalency Program, as is the case with the Proposed Project, would incorporate energy conservation measures that go beyond the City's requirements. Therefore, impacts under the Equivalency Program, as is the case with the Proposed Project, would be less than significant.



### 3.6 Impacts of Off-Site Improvements

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These off-site improvements are all located in developed urban areas. All of the off-site improvements, with the exception of the water regulator station, would occur within, or adjacent to, existing roadways. The water regulator station includes a small amount of above-ground piping equipment, a common element of the urban environment. Implementation of the Project's mitigation measures does not involve the construction of any buildings.

Construction of the proposed intersection and roadway improvements would result in consumption of negligible amounts of electricity and natural gas, if any. Operation of proposed improvements are not anticipated to consume any natural gas, and would consume only minor amounts of electricity (i.e., for operation of signal lights and/or other electronic traffic controls/signs). Such consumption is expected to be well within the service capabilities of LADWP, SCE, and SCGC, the utility service providers for the off-site improvement areas. As such, impacts relating to energy consumption would be less than significant, as the off-site improvements would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities.

## 4.0 MITIGATION MEASURES

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- The Applicant and builders shall consult with the LADWP and SCGC to maximize gains in building design efficiency & reduce building energy requirements to the extent feasible. Technologies and site design features to be considered include high performance glass (low-e & heat mirror), increased R value insulation, natural ventilation strategies, solar building orientation, daylighting strategies & shade tree planting, which shall be incorporated into the final building plans to the extent feasible.
- All buildings shall employ passive heating and cooling design strategies to the extent feasible. Strategies to be considered include orientation; natural ventilation, including cross-ventilation in residential units; high insulation values, energy efficient windows

- including high performance glass; daylighting (in commercial buildings); light-colored or high-albedo (reflective) roofing and exterior walls; window shading; and landscaping that provides shading during the appropriate seasons, especially of the south and west exposures.
- All buildings shall utilize energy efficient mechanical and electrical systems to the extent feasible. Strategies to be considered in commercial buildings include efficient heating, ventilation and air conditioning (HVAC) equipment; variable air volume systems; air economizer cycles that utilize 100 percent outside air when appropriate; under floor air distribution; and building control systems for lighting, HVAC and other systems. Strategies to be considered in residential buildings include fans to assist natural ventilation; centralized water and space conditioning systems; high efficiency individual heating and cooling units; and automatic setback thermostats.
  - Solar systems shall be installed to supplement the heating of all swimming pools as well as hot tubs when provided together with swimming pools, to the extent feasible.
  - All residential buildings shall be equipped with Energy-Star rated appliances, where applicable.
  - Energy efficient lighting, which exceeds the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate interior lighting for office common spaces, such as conference rooms and bathrooms.
  - All fixtures used for exterior lighting of common areas shall be regulated by automatic devices to turn off lights when they are not needed. Energy efficient exterior lighting fixtures, as might be specified by the LADWP, shall be used to the extent such lighting is available and feasible.
  - All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California Air Resources Board at the time of construction of the given building.
  - Shade producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.
  - All buildings shall employ passive heating and cooling design strategies to the extent feasible.
  - All buildings shall be designed to accommodate renewable energy sources, to the extent feasible.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

The Proposed Project, inclusive of the Equivalency Program and Off-Site Mitigation Measures, would result in a net incremental increase in the amount of non-renewable resources consumed through the use of electricity and/or natural gas. As discussed previously in Subsection 2.2.1.1, Electricity, LADWP, as a public utility, has not experienced electricity supply shortfalls, as were experienced during the recent statewide energy shortage, and is anticipated to have ample supplies to meet future demands. No current shortage of natural gas exists, and future shortages are not expected. Energy conservation measures incorporated as Project Design Features would reduce energy consumption from levels that would otherwise occur. The Proposed Project would not result in an increase in demand that exceeds available supply or distribution infrastructure capabilities. Additionally, numerous energy conservation measures that go beyond the City's requirements are proposed to be incorporated into the design and operation of the Project. Therefore, no significant impacts with respect to energy consumption are anticipated to occur.

## 6.0 CUMULATIVE IMPACTS

For the cumulative impacts analysis relative to the Proposed Project, specific projects currently proposed in the Proposed Project vicinity were identified, and the impacts of those near-term individual projects were combined with the impacts of the Proposed Project at buildout along with background growth, in the year 2010. Depending on the energy resource of interest, the cumulative impacts analysis considers the effects of projects within specific geographies that correspond with utility service areas. For example, in the Los Angeles area, natural gas is supplied to customers regardless of city of residence or specific location, whereas electricity is provided by LADWP only to those areas within the City of Los Angeles. As such, cumulative electricity consumption relates only to those related projects that are located within the City of Los Angeles (i.e., served by LADWP), and natural gas consumption relates to all related projects (i.e., all are served by SCGC). See Section III.B, Identification of Related Projects for a list of the related projects that were considered in the cumulative impacts analysis.

The projected electricity and natural gas consumption for the Proposed Project in conjunction with that of cumulative projects and other background growth would be approximately 352,004 MWh/yr and 156.1 million cubic feet per month, respectively. The Project's Equivalency Program would result in a maximum additional 813.2 MWh per year of electricity and 1,019.4 thousand cubic feet (or 1.02 million cubic feet) per month of natural gas, which represents an increase in cumulative energy consumption of 0.2 percent and 0.7 percent, respectively. Table 159 on page 1069 and Table 160 on page 1070 summarize the cumulative electricity and natural gas consumption characteristics. Detailed calculation spreadsheets for the cumulative projects' energy consumption are presented in Appendix M-4. Based on existing information from the California Energy Commission relative to projected energy consumption

Table 159

## CUMULATIVE ELECTRICITY CONSUMPTION

Use	Land Use					Annual Electricity Consumption (MWh)				
	Proposed Project	Related Projects within LADWP Service Area*	Background Growth	Proposed + Related Projects + Background Growth	Consumption Factor <sup>b</sup>	Units	Proposed Project	Related Projects within LADWP Service Area*	Background Growth	Proposed + Related Projects + Background Growth
Residential (d.u.)	2,600	5,718	2,080	10,398	5,626.50	kWh/yr/d.u.	14,629	32,172	11,700	58,502
Office (s.f.)	175,000	5,918,796	609,380	6,703,176	12.95	kWh/yr/s.f.	2,266	76,648	7,891	86,806
Retail (s.f.)	150,000	726,564	87,656	964,220	13.55	kWh/yr/s.f.	2,033	9,845	1,188	13,065
Hotel (rooms)	0	1,650	165	1,815	8457.5	kWh/yr/room	0	13,955	1,395	15,350
Civic/Inst. (s.f.)	40,000	389,300	42,930	472,230	10.5	kWh/yr/s.f.	420	4,088	451	4,958
Warehouse (s.f.)	0	190,000	19,000	209,000	4.35	kWh/yr/s.f.	0	827	83	909
Restaurant (s.f.)	0	60,909	6,091	67,000	47.45	kWh/yr/s.f.	0	2,890	289	3,179
Theater (seats)	0		0	0	311.65	kWh/yr/seat	0	0	0	0
Industrial (s.f.)	0	14,593,500	1,459,350	16,052,850	10.5	kWh/yr/s.f.	0	153,232	15,323	168,555
Parking (spaces)	0	1,815	182	1,997	340	kWh/yr/space	0	617	62	679
<b>Totals</b>							<b>19,348</b>	<b>294,274</b>	<b>38,382</b>	<b>352,004<sup>c</sup></b>

kWh = kilowatt-hour      s.f. = square feet      d.u. = dwelling unit      MWh = megawatt-hours (1 MWh = 1,000 kWh)

Consumption factors are from the South Coast Air Quality Management District's *CEQA Air Quality Handbook* (April 1993).

\* Related projects within the LADWP service area would utilize the same collective electricity supply and distribution sources, which are the basis for cumulative impacts analysis; all such projects are those within the City of Los Angeles, which are assumed to be served by LADWP.

<sup>a</sup> Background growth adds 25 percent for residential development and 10 percent for non-residential development (all other uses) to consumption/generation totals to account for growth of related projects that are not subject to environmental review. In other words, residential consumption/generation rates are 25 percent higher and all other rates are 10 percent higher than would otherwise be quantified. See Appendix M-4 for detailed background growth calculations.

<sup>b</sup> Generation/consumption factors were derived assuming 23 ft<sup>2</sup> for each theater seat, 33 ft<sup>2</sup> for each restaurant seat, 850 ft<sup>2</sup> for each hotel room, 212 ft<sup>2</sup> for each school student, and 154 ft<sup>2</sup> for each parking space. See Appendix N-4 for detailed factor derivations.

<sup>c</sup> Under the Project's Equivalency Program, the total cumulative electricity consumption would increase by a maximum of 813.2 MWh per year, which represents an increase of 0.2 percent over the total cumulative consumption of 352,004 MWh per year.

Source: Camp Dresser & McKee Inc. 2003.

Table 160

## CUMULATIVE NATURAL GAS CONSUMPTION

	Land Use					Monthly Natural Gas Consumption (kcf)				
	Proposed Project	Related Projects	Background Growth	Proposed + Related Projects + Background Growth	Consumption Factor <sup>b</sup>	Units	Proposed Project	Related Projects	Background Growth	Proposed + Related Projects + Background Growth
Residential (d.u.)	2,600	9,552	3,038	15,190	5,338.0	c.f./mth/d.u.	13,879	50,989	16,217	81,084
Office (s.f.)	175,000	14,409,396	1,458,440	16,042,836	2.0	c.f./mth/s.f.	350	28,819	2,917	32,086
Retail (s.f.)	150,000	3,825,667	397,567	4,373,234	2.9	c.f./mth/s.f.	435	11,094	1,153	12,682
Hotel (rooms)	0	4,307	431	4,738	4,080.0	c.f./mth/room	0	17,573	1,757	19,330
Civic/Inst. (s.f.)	40,000	2,116,022	215,602	2,371,624	2.0	c.f./mth/s.f.	80	4,232	431	4,743
Warehouse (s.f.)	0	357,868	35,787	393,655	2.0	c.f./mth/s.f.	0	716	72	787
Restaurant (s.f.)	0	192,929	19,293	212,222	4.8	c.f./mth/s.f.	0	926	93	1,019
Theater (seats)	0	3,391	339	3,730	66.7	c.f./mth/seat	0	226	23	249
Industrial (s.f.)	0	15,572,657	1,557,266	17,129,923	0.2416	c.f./mth/s.f.	0	3,763	376	4,139
Parking (spaces)	0	2,695	270	2,965	0.0	c.f./mth/space	0	0	0	0
<b>Totals</b>							<b>14,744</b>	<b>118,337</b>	<b>23,038</b>	<b>156,119<sup>c</sup></b>

c.f. = cubic feet

kcf = thousand cubic feet

d.u. = dwelling unit

s.f. = square feet

Consumption factors are from the South Coast Air Quality Management District's CEQA Air Quality Handbook.

<sup>a</sup> Background growth adds 25 percent for residential development and 10 percent for non-residential development (all other uses) to consumption/generation totals to account for growth of related projects that are not subject to environmental review. In other words, residential consumption/generation rates are 25 percent higher and all other rates are 10 percent higher than would otherwise be quantified. See Appendix M-4 for detailed background growth calculations.

<sup>b</sup> Generation/consumption factors were derived assuming 23 ft<sup>2</sup> for each theater seat, 33 ft<sup>2</sup> for each restaurant seat, 850 ft<sup>2</sup> for each hotel room, 212 ft<sup>2</sup> for each school student, and 154 ft<sup>2</sup> for each parking space. See Appendix N-4 for detailed factor derivations.

<sup>c</sup> Under the Project's Equivalency Program, the total cumulative natural gas consumption would increase by a maximum of 1,019.4 kcf per month, which represents an increase of 0.7 percent over the total cumulative consumption of 156,119 kcf per month.

Source: Camp Dresser & McKee Inc. 2003.

for 2010 (those projections from which affected utilities determine future demand, and associated supply requirements), the projected demands on electricity and natural gas consumption from operation the Proposed Project, inclusive of the Project's Equivalency Program and off-site improvements, in conjunction with those of the related projects, are anticipated to be within the service capabilities of LADWP and SCGC.

Overall, the Proposed Project, the Equivalency Program, and off-site improvements, in conjunction with related projects, are not anticipated to result in an increase in demand for energy that exceeds available supply or distribution capabilities; hence, cumulative energy consumption would be a less-than-significant impact.

The cumulative increase in local energy consumption will constitute an incremental increase in the depletion of non-renewable resources. While the nature and extent of energy conservation measures incorporated into each of the related projects is not readily ascertainable, it is anticipated that all projects would, at a minimum, meet state Title 24 energy conservation standards. The affected utility companies are expected to accommodate the delivery of energy to the Proposed Project, including the Equivalency Program and Off-Site Mitigation Measures, and related projects. Whether the delivery demands could be accommodated by the existing transmission system or by an upgraded system in the future would depend on an evaluation of future demand levels and system capabilities. Based on the requirements for energy efficient design in new development projects (e.g., Title 24 efficiency standards) and the Project Design Features to be implemented as part of the Proposed Project, it is expected that the design of the Proposed Project and related projects would incorporate energy conservation measures that, at a minimum, meet City requirements. Consequently, cumulative impacts relative to energy efficiency would be less than significant. These impacts are inclusive of the Proposed Project, Equivalency Program, and off-site improvements.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**N. UTILITIES**  
**(1) WATER CONSUMPTION**

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**1.0 INTRODUCTION**

This section addresses the potential impacts of the Proposed Project on water supply and water distribution infrastructure. This analysis estimates the potable and reclaimed water demands of the project at buildout and compares this demand to existing and planned water supply sources and conveyance facilities. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

The impacts associated with on-site water resources, such as groundwater and surface water, are addressed in Section IV.C, Water Resources, of this EIR.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Regulatory Framework**

**2.1.1 State Level**

Title 20 of the California Administrative Code, (CAC) Section 1604, establishes efficiency standards (i.e., maximum flow rates) for all new showerheads, lavatory faucets, and sink faucets and prohibits the sale of fixtures that do not comply with the regulations.

Other applicable State water conservation laws include:

- Health and Safety Code Section 17921.3 requires all new buildings, as of January 1, 1983, to install water conservation water closets, as defined by American National Standards Institute (ANSI) Standard A112.19.2, and urinals and associated flushometer valves that use less than an average of 1.5 gallons per flush.
- Title 20, CAC, Section 1604(f) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory and sink faucets, as specified in ANSI A112.18.1M-1979.

- Title 20, CAC, Section 1606(b) prohibits the sale of fixtures that do not comply with regulations.
- Title 24, CAC, Section 2-5307(b) prohibits the installation of fixtures unless the manufacturer has certified compliance with the flow rate standards.
- Title 24, CAC, Section 2-5352(i) and (j) address pipe insulation requirements that can reduce water used before hot water reaches fixtures.
- Health and Safety Code Section 4047 prohibits installation of residential water softening appliances unless accompanied by water conservation devices on fixtures using softened water.

The California Department of Health Services (DHS) is charged with regulating the quality of reclaimed water. The Reclaimed Water Unit of DHS has developed the water reclamation criteria commonly known as Title 22 of the CAC, which prescribes treatment requirements for reclaimed water to be used for non-potable purposes and establishes standards for distribution and use. The West Basin Municipal Water District (WBMWD), the recycled water provider for the Proposed Project site, is regulated by the Regional Water Quality Control Board (RWQCB) for water quality, including Title 22 recycled water. As a permit condition, the WBMWD continually monitors recycled water quality and submits annual reports to the RWQCB, allowing them to continue to procure Title 22 water to customers in the vicinity of the Proposed Project site.

The California Urban Water Management Planning Act requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AF/yr) of water to prepare and adopt an Urban Water Management Plan (UWMP). UWMPs are required to include estimates of past, current, and projected potable and recycled water use, identify conservation and reclamation measures currently in practice, describe alternative conservation measures, and provide an urban water shortage contingency plan.

The requirements for an UWMP were recently amended by Senate Bill 610 (Costa) and signed into law by Governor Davis in October 2001. Under Senate Bill 610, an urban water supplier (e.g., the Los Angeles Department of Water and Power [LADWP]) responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, Senate Bill 610 requires additional information to be included in the UWMP such as: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.



Similarly, Assembly Bill 901, which was also signed into law by Governor Davis in October 2001, requires UWMP's to contain information specifically pertaining to the quality of water supply sources. In addition to requirements related to UWMPs, Senate Bill 610 recognizes the need to link water supply and land use planning as currently required by Section 10910 of the Water Code. Under certain circumstances, a city or county is required to request in conjunction with a development project a water supply assessment containing specific information from the water service provider. Under SB 610, it is the responsibility of the water service provider to prepare a water supply assessment requested by a city or county for any "project" defined by Section 10912 of the Water Code that is subject to CEQA. The bill prescribes a timeframe within which a public water system is required to submit the assessment to the city or county and authorizes the city or county to seek a writ of mandamus to compel the public water system to comply with requirements relating to the submission of the assessment. If the provider determines that water supplies are, or will be, insufficient, plans must be submitted for acquiring additional water supplies. Additionally, the bill requires the city or county to include the water supply assessment and other pertinent information in any environmental document prepared (e.g., EIR) for the project pursuant to the act. Similarly, Senate Bill 221 (Kuehl), a companion bill to Senate Bill 610, modifies state law (i.e., the Government Code, Subdivision Map Act and the Business and Professions Code) to focus on the link between water supply and land use planning, particularly for new large projects in non-urban areas (i.e., under certain conditions, approval of a subdivision map is prohibited unless the legislative body of a city or county provides written verification from the water service provider that a sufficient water supply is, or will be, available). LADWP, as a water service supplier, has incorporated the provisions of SB 610 and SB 221 into its water supply planning process. The water demand assessment for individual projects, such as the Proposed Project, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and how they would be secured if needed.<sup>468</sup>

### 2.1.2 Local Level

The LADWP is the water purveyor serving the Proposed Project site. In recent years, conservation has become an important element of managing the water supplies of Southern California. To this end, LADWP has prepared an UWMP to promote efficient use and management of its water resources.

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<sup>468</sup> *Bautista, Alvin, Water Resources Planning and Policy Division, Los Angeles Department of Water and Power, Personal Communication, May 10, 2002.*

In addition to summarizing historic, present, and projected water demand and water supply sources, the City's Plan outlines the strategies that will be used to meet the City's current and future water needs, within the following categories:<sup>469</sup>

- Protect existing water supplies from contamination and clean up ground water supplies;
- Pursue cost-effective water conservation and recycling projects to increase supply reliability and offset increases in water demand due to growth;
- Seek outside funding to offset capital investments needed to develop alternative supplies such as conservation and recycling projects and resource management programs;
- Maintain the structural integrity of the Los Angeles Aqueduct and in-City water distribution systems.

In order to reduce the impact of potential supply deficiencies, the Los Angeles City Council has enacted ordinances mandating measures to reduce water consumption. Ordinance Nos. 163,532 and 164,093, enacted in 1988, with subsequent amendments, require new buildings to install all low-flush toilets and urinals (1.5 gallons per flush) in order to obtain building permits. Ordinance No. 163,532 also contained provisions requiring xeriphytic (low-water consumption) landscaping. This was superseded by Ordinance No. 170,978, which was approved by the City Council in April 1996 and has been in place since July 12, 1996. Ordinance No. 170,978 is a comprehensive landscape ordinance that applies to all projects except single-family dwellings that create 2,000 sq.ft. or more of non-permeable surface. The Ordinance replaces the blanket requirement for xeriscape with "Water Management." Although a xeriscape point system chart is still used, it has been slightly augmented by increased choices as well as strengthened so that projects have to propose and document substantive water conserving features and techniques. The measures described in the above-mentioned ordinances are considered baseline project permitting conditions.

In an effort to maintain adequate water supplies to its customers during drought conditions, LADWP adheres to the provisions of the Water Shortage Contingency Plan, contained in the 1995 LADWP Urban Water Management Plan.<sup>470</sup> The Water Shortage Contingency Plan summarizes the effort by LADWP to continue to provide a sufficient supply of

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<sup>469</sup> *City of Los Angeles Department of Water and Power, Urban Water Management Plan Fiscal Year 2000-2001 Annual Update ([www.ladwp.com/water/supply/uwmp/2001Update.pdf](http://www.ladwp.com/water/supply/uwmp/2001Update.pdf)).*

<sup>470</sup> *Los Angeles Department of Water and Power, "Water Shortage Contingency Plan," May 1995. Included as Appendix B in the Los Angeles Department of Water and Power "Urban Water Management Plan for the City of Los Angeles," November 1995.*

water to meet the health and safety needs of the City in case of a water supply shortage condition. Depending on the severity of conditions, LADWP implements demand reduction measures to minimize wasteful water use using a phased approach. The main element of this phased approach is the City's water rates structure that was enacted in February 1993. This two-tiered rate has a lower block set to accommodate water use at a typical home. The upper block is set at a price to reflect the true cost of acquiring and delivering additional water. In addition, the rate structure has increased upper block water rates during the summer to encourage conservation during the hotter periods of the year when demand is higher.

To increase conservation during periods of drought or other water shortage periods, the water rate structure has shortage year rates as well. When the Board of Water and Power Commissioners determines that the water supply available to the City is insufficient to meet the City's normal water supply needs, it determines the degree of shortage and applies the corresponding commodity charges. This procedure of increasing the price of water to cause the desired demand reductions replaces the Emergency Water Conservation Plan (EWCP) provisions, which were approved in July 1990 as part of City Ordinance No. 166,080. The EWCP required "across the board" water reductions by set percentages (rationing) from a specified base year usage, and was perceived to be unfair to those who conserved. Additional measures can be phased in as a drought continues to provide some immediate demand reductions and increase public awareness of the need to conserve water. The following list of drought-related demand reduction actions could be taken and used in conjunction with the water rate structure's shortage year rates:

***Mandatory Prohibitions Against Wasteful Practices.*** The provisions of the EWCP which remain in effect are the Phase IA conditions known as Prohibited Uses. These contain six wasteful water use practices that are permanently prohibited by all City of Los Angeles customers. These prohibited uses are intended to eliminate waste and increase public awareness of the need to conserve water:

1. No hose-washing of hard surfaces such as: walkways, driveways, or parking areas.
2. No water shall be used to clean, fill, or maintain levels in decorative fountains unless part of a recirculating system.
3. No restaurant, hotel, café, cafeteria, or other public place where food is sold shall serve drinking water to any customer unless expressly requested.
4. Water leaks must be reported and repaired in a timely manner.

5. No lawn, landscape, or other turf area shall be watered between the hours of 10:00 A.M. and 5:00 P.M. from April through September, and between 11:00 A.M. and 3:00 P.M. from October through March (subject to City Council approval). These restrictions do not apply to licensed nurseries, gardeners, and drip irrigation systems.
6. No watering that causes excess water to runoff onto an adjoining sidewalk, driveway, street, gutter, or ditch.

Penalties for violations of prohibited uses consist of written warning for the first violation, \$50 surcharge for the second violation, \$100 surcharge for the third violation, and \$150 surcharge for the fourth violation. A flow-restrictor or possible shutoff may be imposed after four or more violations.

***Severe Shortage (15 to 20 percent below average year).*** When supplies are projected to be 15 to 20 percent below the average year supply, the following prohibited uses are added:

1. Wash cars only with bucket or hand-held hose with shut-off valves; restrict frequency of landscape irrigation to two times per week.
2. Reduce water used for street cleaning. (The street cleaning program, which normally uses relatively little water, has been modified because of the drought to reduce potable water use, and is utilizing reclaimed water where practicable.)
3. Develop a large industrial customer incentive program that provides a monetary credit for all water reduction beyond a specified goal.
4. Implement a surcharge program for single-family and duplex customers who have not yet complied with the retrofit provisions of City Ordinance 35362, the Water Conservation Ordinance to Reduce Sewer Flows.

***Critical Shortage (20 to 35 percent below average year).*** When supplies are projected to be 20 to 35 percent below the average year supply, the following prohibited uses are added:

1. Eliminate municipal public water uses (such as street cleaning) not required for health or safety unless tank truck water supplies of reclaimed wastewater are being used.

2. Irrigate public parks and landscape areas only with reclaimed water.

***Super Critical Shortage (35 to 50 percent below average year).*** When supplies are projected to be 20 to 35 percent below the average year supply, the following prohibited uses are added:

1. Commercial car washes must use recycled water in both the soap and rinse cycles; eliminate private irrigation of turf and landscaped areas except by drip irrigation systems or buckets.
2. Require all water used for construction to be reclaimed water.

LADWP's long-range water conservation program is driven by the need to increase water use efficiency. This will reduce demand, extend supply and therefore, provide for greater reliability. Toward that end, LADWP is continuing to pursue its proposed programs, maintain and increase its existing programs, and develop new and innovative programs. Emphasis is being placed on structural conservation, such as ultra-low-flush toilet replacements, which result in permanent per capita water use reduction. The ability to achieve water reduction during droughts by voluntary measures is likely to be more difficult in the future as customers adjust to a conservation ethic and adopt permanent measures to reduce water use.

City Ordinance No. 170,022, approved on September 22, 1994, adopted Appendix J of Part 5 of Title 24 of the California Code of Regulations (California Plumbing Code) by reference into the Los Angeles Municipal Code. This establishes provisions for the construction, alteration, and repair of graywater systems for subsurface landscape irrigation at single-family dwellings.

## **2.2 Existing Conditions**

### **2.2.1 Water Supply**

#### **Los Angeles Department of Water and Power**

LADWP obtains its water supplies from three major sources: (1) The Owens Valley and the Mono basin on the east side of the Sierra Nevada Mountains via the Los Angeles Aqueduct (LAA); (2) Northern California and Colorado River imports from the Metropolitan Water District of Southern California (MWD); and (3) Local groundwater basins, including the San Fernando, Sylmar, Central Coast and West Coast Basins. In addition to these sources, some wastewater within the LADWP service area is reclaimed for reuse for irrigation, industrial use, and groundwater recharge.

The percentage of water supplied by the three primary water sources has changed over time. Throughout the 1970s and most of the 1980s, the LAA provided the majority (74 percent) of the City's water, with local groundwater and MWD sources providing the remainder. This distribution varied substantially due to the drought of 1987 to 1992, as well as litigation over water diversions from the Owens Valley and the Mono Basin.<sup>471</sup> In addition, groundwater contamination in the San Fernando Valley area has reduced the availability and usability of local groundwater supplies. Following these unusual circumstances, the distribution returned to similar levels as in the 1970s and 1980s.<sup>472</sup> In fiscal year 2001-2002, the LAA delivered 228,396 acre-feet (AF) (34 percent), local groundwater produced 73,387 AF (11 percent), and MWD supplied 372,357 AF (55 percent). During that year, LADWP purchases made up approximately 15 percent of MWD's total water sales to the Southern California region.<sup>473</sup>

During fiscal year 2001-2002, LADWP supplied 679,099 AF of water, accounting for a 2 percent increase from the prior year's usage of 665,695 AF. Single-family residential customers consumed 35 percent of all water used, multi-family residential 28 percent, commercial 17 percent, governmental 7 percent, industrial 3 percent, and non-revenue water 10 percent. Non-revenue, or unaccounted water, consists of unbilled water used for fire fighting, miscellaneous system losses (e.g., evaporation, system leaks, water main breaks), water meter-read inaccuracy, and other factors.<sup>474</sup> LADWP anticipates annual water demand within the Department's service area to increase by 2010 to between 718,000 AF (in a normal year) and 761,000 AF (in a dry year), which represents a demand increase of 5.7 percent to 12.1 percent, respectively, between 2002 and 2010. This increased demand in water use is accounted for in LADWP's Final Year 2000 Urban Water Management Plan Update, and LADWP has identified various means and options for securing adequate water supplies to meet the needs anticipated for 2010, as well as through the year 2020.<sup>475</sup>

### **Metropolitan Water District**

MWD provides all, or a portion of, the water supply for 27 member agencies comprising 14 cities, 12 municipal water districts, including LADWP, and one county water authority. MWD imports water from the Colorado River Aqueduct (CRA) and the State Water Project (SWP) in the Sacramento-San Joaquin Delta and distributes it to member agencies.

<sup>471</sup> Los Angeles City Department of Water and Power, *Urban Water Management Plan*, November 1995.

<sup>472</sup> Los Angeles City Department of Water and Power, *Urban Water Management Plan*, November 1995.

<sup>473</sup> Los Angeles City Department of Water and Power, *Urban Water Management Plan Final Fiscal Year 2001-2002 Annual Update* (<http://www.ladwp.com/water/supply/uwmplan/2001-02UWMP.pdf>).

<sup>474</sup> Los Angeles City Department of Water and Power, *Urban Water Management Plan Final Fiscal Year 2001-2002 Annual Update*. <http://www.ladwp.com/water/supply/uwmplan/2001-02UWMP.pdf>.

<sup>475</sup> City of Los Angeles Department of Water and Power, *Final Year 2000 Urban Water Management Plan Update, 2001* (<http://www.ladwp.com/water/supply/uwmplan/2000UWMP.pdf>).

Based on projected growth, MWD expects that water demands in the MWD service area will rise from 3.6 million acre-feet (AF) to 4.8 million AF in 2020. In order to accommodate this projected growth in water demand, MWD developed an Integrated Water Resources Plan (IRP) in 1996. The IRP is a 25-year comprehensive water resources plan for Southern California. Its objective is to ensure the reliability, affordability, quality, diversity, and adaptability of the regional water supply. MWD anticipates that implementation of the IRP will allow it to provide for all the firm wholesale water demands of its member agencies in 98 out of 100 years, with the remaining years requiring a shortage allocation plan.

The IRP proposes that a preferred resource mix of imported and local supplies be used to meet projected needs. The future supply sources for MWD include groundwater pumping, surface water diversion, water recycling including reclamation, groundwater recovery, CRA, SWP, and storage and water transfers.<sup>476</sup>

In early 2002, a federal court decision required that California be limited to 4.4 million AF/year of Colorado River water, pursuant to a 1964 U.S. Supreme Court Decree in *Arizona v. California and the Boulder Canyon Project Act*. Since water from the CRA represents a substantial portion of MWD's supplies, MWD issued a report to address the challenges and solutions for dealing with its supply reduction.<sup>477</sup> The report recognizes that retail water supply reliability is dependent on the development of both local resources and supplemental imported water supplies. In addition, the report identifies actual and projected demands for water from MWD, as well as the water supplies available to MWD to meet those demands. In light of reduces Colorado River supplies and water quality constraints on some supplies, options being considered by MWD to secure adequate supplies include full utilization of MWD's Diamond Valley Lake Reservoir, re-operation of storage and transfer options, enhanced conservation programs, and development of additional local resources. Through allocation of available supply resources and investment in new or expanded supply and storage options, MWD has determined that it will have adequate supplies to meet projected demands through the 20-year planning horizon.

### **2.2.2 Water Reclamation**

One approach to reducing potable water demand is the use of reclaimed water for irrigation, industrial, and other non-potable uses. Reclaimed water is water that has been used and then treated to a quality suitable for specific non-potable uses while protecting public health. Water reclamation is considered a new water resource intended to reduce the need to develop

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<sup>476</sup> *Metropolitan Water District of Southern California, Integrated Resources Plan, 1996.*

<sup>477</sup> *Metropolitan Water District of Southern California, "Report on Metropolitan's Water Supplies: A Blueprint for Reliability," March 25, 2003.*

additional potable water supplies. In addition to reducing potable water demand, the use of reclaimed water reduces the amount of wastewater effluent discharged into the ocean.

Currently, the City of Los Angeles reuses a small portion of treated wastewater, primarily for in-plant uses at the treatment plants, irrigation of parks and golf courses, and industrial cooling. In 1990, the City adopted a goal to substantially increase wastewater reclamation up to 250,000 acre-feet per year (AF/yr) in 2010. Working toward this goal, the LADWP presently has plans to recycle approximately 80,000 AF/yr, to meet about 10 percent of the City's estimated water supply for 2010. In 1991, the State legislature established a goal to reclaim 700,000 AF/yr of water statewide by 2000, and one million AF/yr by 2010.<sup>478</sup>

The WBMWD operates the West Basin Water Recycling Plant (WBWRP), located approximately seven miles south of the eastern portion of the Proposed Project site in the City of El Segundo. The WBWRP receives approximately 42.5 million gallons per day (mgd) of secondary effluent from the Hyperion Treatment Plant (HTP). This reclaimed water is intended for industrial use, irrigation, and groundwater basin barrier injection. The WBWRP currently treats a total of 42.1 mgd of the secondary effluent for the following applications<sup>479</sup>: 30 mgd of Title 22 recycled water for irrigation; 7.5 mgd of high quality recycled water for seawater intrusion barrier injection; and, 4.6 mgd of recycled water for use as boiler feed water at local refineries. As discussed above in Subsection 2.1, Regulatory Framework, the RWQCB, using health standards established by the DHS, regulates WBWRP's Title 22 water. Such irrigation water must meet or exceed the State Title 22 standards for water quality. As a permit condition to procure Title 22 recycled water, the RWQCB requires ongoing monitoring of product water, as well as annual reporting of water quality analysis results. The City of Los Angeles has a contract with WBMWD to both deliver HTP secondary treated effluent water to the WBWRP for tertiary treatment and to be entitled to at least 25,000 AF/yr of reclaimed water for reuse.<sup>480</sup> The WBWRP ultimately plans to have a capacity of 100 mgd, producing up to about 100,000 AF/yr of reclaimed water to a variety of users.<sup>481</sup>

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<sup>478</sup> *Metropolitan Water District of Southern California, Integrated Resources Plan, 1996.*

<sup>479</sup> *The difference in the volume of wastewater treated at WBWRP and the volume of wastewater received from HTP (i.e., 0.4 mgd), is the volume of wastewater solids or brine that is extracted from the influent wastewater during treatment.*

<sup>480</sup> *"Reclaimed Water Agreement Between West Basin Municipal Water District and the City of Los Angeles," July 3, 1991.*

<sup>481</sup> *Hinds, John, Water Resources Planning Section, Los Angeles City Department of Water and Power, Telephone Communication, May 21, 1996.*



As part of its “West Basin Water Recycling Project,”<sup>482</sup> WBMWD constructed a pipeline in March 1997 from the WBWRP to Westchester Golf Course, located less than one mile south of the Proposed Project site. An extension along Lincoln Boulevard with a peak demand capacity of 3,700 gallons per minute, portions of which have already been constructed by WBMWD and LADWP, will service the Proposed Project site. The extension would start at 83rd Street and run to Jefferson Boulevard and on to Playa Vista Drive. This pipeline has been constructed from 83rd Street to approximately Hughes Terrace and on Jefferson Boulevard between Lincoln Boulevard and Playa Vista Drive.<sup>483</sup> The remaining portion of the pipeline, Lincoln Boulevard between Hughes Terrace and Jefferson Boulevard, will be coordinated with Caltrans’ Lincoln Boulevard Widening Project.<sup>484</sup>

### 2.2.3 Water Consumption

As most of the Proposed Project site is vacant land, relatively little water is currently being consumed. There are two buildings within the Proposed Project site, Building 22 and Building 45, which remain from the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant. Building 22 is a 5,500-sq.ft. warehouse used for storage and, as such, only nominal quantities of water are consumed. Building 45 consists of approximately 43,500 sq.ft. and is presently used occasionally for filming (i.e., sound stage), production-related activities, and storage; hence, consumption of water is also nominal. Other small buildings, including sheds, minor storage structures, and construction trailers (associated with development of the adjacent Playa Vista First Phase Project), currently exist within the Proposed Project site. These buildings, although connected to local water service infrastructure, consume only nominal quantities of water.

### 2.2.4 Water Distribution

The Proposed Project site lies within the 205-foot pressure zone (i.e., the pressure equivalent if the water in the system were at 205 feet above sea level) of the LADWP water supply system. This pressure zone generally encompasses the Venice area, south to the Proposed Project site, west of the San Diego Freeway, but excluding the Marina del Rey area, which is served by the County. All water supplied to this zone is transferred from the adjacent 477-foot pressure zone through three regulator stations, one of which is located north of Venice Boulevard at Grand View Avenue, the second is at Sepulveda Boulevard south of Centinela Avenue, and

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<sup>482</sup> *West Basin Municipal Water District provides recycled water for municipal, commercial and industrial applications via its West Basin Water Recycling Project. The recycling project distributes almost 22,000 acre-feet of recycled water annually to more than 150 sites in the South Bay area (www.westbasin.com).*

<sup>483</sup> *Cook, Paul, West Basin Municipal Water District, Personal Communication, May 13, 2002.*

<sup>484</sup> *Hinds, John, Water Resources Planning Section, Los Angeles City Department of Water and Power, Personal Communication, May 13, 2002.*

the third is at Jefferson and Sepulveda Boulevards. These stations reduce pressure from the 477-foot zone to the 205-foot zone. Flows into the 205-foot zone range from about 2 cubic feet per second (cfs) to about 12 cfs.<sup>485</sup> Key transmission mains in the zone include a 25-inch and 20-inch diameter line running in Jefferson Boulevard, Lucille Street, Centinela Avenue a 12-inch water main in Centinela Avenue south of Bluff Creek Drive, and a 16-inch diameter line in Jefferson adjacent to most of the Proposed Project site.

At the present time, there is a limited, privately owned distribution system within the Proposed Project site, serving existing buildings that remain from the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant, both within the Proposed Project site and adjacent to the Project site. This system has a 10-inch connection to the LADWP system near Jefferson Boulevard and Centinela Avenue. The fire protection system, which serves the existing plant buildings within the Proposed Project site and adjacent to the Project site, includes a pump station within the adjacent Playa Vista First Phase Project site, installed in 1988.

In addition, LADWP is completing several major improvements in the general vicinity of Playa Vista that will enhance service to existing customers near the Proposed Project site and provide improved water service availability and delivery.

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

LADWP does not maintain any standard unit demand factors for specific types of land uses.<sup>486</sup> In the absence of any standard water usage factors, water consumption estimates were developed for long-term operational use based on land use wastewater generation factors developed by the City of Los Angeles for the *Draft L.A. CEQA Thresholds Guide*, with 10 percent added to account for evaporation and absorption losses. Since reclaimed water is used to operate the cooling towers and toilets, the discrepancy between the water consumption factor and the waste generation factor is reflected in an increase of 53 gallons per day/thousand square feet (gpd/ksf) for the wastewater generation factor of office uses. It is assumed that reclaimed water would be used for irrigation of all parks, landscaped medians, common open space and other such landscaped areas. The potable water factors are summarized in Table 161 on page 1084.

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<sup>485</sup> *City of Los Angeles Department of Planning, Final Environmental Impact Report, Playa Vista First Phase Project, May 1993.*

<sup>486</sup> *City of Los Angeles, Draft L.A. CEQA Thresholds Guide, May 1998.*

Table 161

## WATER CONSUMPTION FACTORS

Land Use <sup>a</sup>	Average Generation Factor
Residential	176 gpd/d.u.
Office	165 gpd/ksf
Retail	88 gpd/ksf
Civic/Institutional	88 gpd/ksf

*d.u.* = dwelling unit                      *gpd* = gallons per day                      *ksf* = thousand square feet

<sup>a</sup> All water consumption factors are wastewater generation factors with 10 percent added to account for evaporation and absorption losses. The residential water consumption factor is derived from the average wastewater generation factor for studio, 1-, 2-, 3-, and 4-bedroom residential units. The community center wastewater generation factor presented in the City of L.A. CEQA Guide is based upon the number of occupants and applies specifically to community center uses. As the civic/institutional facilities at Playa Vista will include community centers, as well as other types of community uses, which exhibit similar intensities and types of uses as retail facilities, the retail factor was used to calculate projected water consumption.

Source: City of Los Angeles, Draft L.A., CEQA Thresholds Guide, May 1998, wastewater generation factors, multiplied by 110 percent.

During summer months, daily demands by some uses are substantially higher than during winter. Maximum day demands normally occur during hot summer days. For the City of Los Angeles, the maximum day water demand is approximately 1.7 times the average day demand.<sup>487</sup> Furthermore, water demands fluctuate throughout the day; peak periods are typically reached in the later afternoon and/or early evening hours. The highest flow rate during the year is during the peak hour of the maximum day, normally called the peak hour demand. In Los Angeles, peak hour demands are approximately 3 times the average demand.<sup>488</sup>

These three types of demand factors (average day, maximum day, and peak hour) are important relative to the proper functioning of a water supply system. Average demands are used to determine the total annual water supply source requirements; maximum day demands are used to determine the maximum demand on supply sources and to size the capacity of pumping stations and reservoirs; and peak hour demands are important for the sizing of distribution pipelines and the design of reservoirs.

Most of the potable water consumption factors are applied to the square footage of a particular land use. These square footages were obtained from the Project Description, as were the number of residential dwelling units.

Reclaimed water is assumed to be used for landscape irrigation, office building cooling systems, and office building toilets. The irrigation factor for landscaping is assumed to be the

<sup>487</sup> Los Angeles Department of Water and Power, *Draft Urban Water Management Plan*, November 1990.

<sup>488</sup> Los Angeles Department of Water and Power, *Draft Urban Water Management Plan*, November 1990.

same for all types of landscaping (i.e., greenbelts, gardens, etc.). This factor is 3,650 gallons per day per acre (gpd/acre), as shown in Table 162 on page 1086. The factors used to estimate maximum day and peak hour irrigation demands are 2.2 and 4.5 times the average consumption, respectively, and are based on an analysis of evapotranspiration data, climatic conditions, and expected irrigation practices, that include a set number of irrigation hours per day, generally at night.<sup>489</sup> As shown in Table 162, the maximum day irrigation demands would be approximately 8,030 gpd/acre and the peak hour irrigation demands would be approximately 11.4 gallons per minute per acre (gpm/acre).

The quantity of reclaimed water used for toilet flushing was calculated by assuming an average of 8 gallons of reclaimed water per employee per day and 4 employees per 1,000 square feet of office space. Reclaimed water used for office building cooling systems was calculated by using a factor of 32 gpd per ksf – the difference between the office building with cooling tower factor (182 gpd/ksf) and the office building without cooling tower factor (150 gpd/ksf), and included 21 gpd/ksf for reclaimed water use associated with office toilets.<sup>490</sup> As such, the office wastewater generation factor, including cooling tower and toilet usage, is 203 gpd/ksf.

### 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p. K.1-3) states that the determination of the significance of impacts on water shall be made on a case-by-case basis considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

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<sup>489</sup> *Camp, Dresser & McKee, Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992.*

<sup>490</sup> *City of Los Angeles, Draft L.A. CEQA Thresholds Guide, May 1998.*

**Table 162****LANDSCAPE WATER CONSUMPTION FACTORS**

<b>Land Use</b>	<b>Average Consumption Factor<sup>a</sup></b>	<b>Maximum Day Factor<sup>a</sup></b>	<b>Peak Hour Factor<sup>a</sup></b>
Landscape	3,650 gpd/acre	8,030 gpd/acre	11.4 gpm/acre

*gpd = gallons per day*

*gpm = gallons per minute*

<sup>a</sup> *Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992.*

Based on these factors the Proposed Project would have a significant impact if:

- The total estimated water demand for the Project at buildout would exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure); or
- The Project would exceed the projected employment, housing, or population growth projections of the applicable Community Plan as assumed in the planning for future water infrastructure needs.

### 3.3 Project Design Features

The Proposed Project would implement water conservation methods such as ultra low-flow toilets, low-flow showerheads, low-flow fixtures and water saving appliances, as required by local law. Although not required by the City or other regulatory agency, the Applicant has established, as part of building design and construction requirements and its Residential Sustainable Performance Guidelines, additional water conservation requirements for the Proposed Project, such as the installation of Energy Star-rated dishwashers and washing machines and, in office, retail and other public buildings, water faucet fixtures with activators that automatically shut off the flow of water when not in use. Refer to Appendix M-1 for the Residential Sustainable Performance Guidelines.

To the extent supply is available, reclaimed water would be used for landscape irrigation in open space areas such as parks and common open space within development areas. The irrigation systems would include efficiency features such as timers, moisture probes, spray limiters, etc., as practical and appropriate. Reclaimed water would be provided by the WBMWD from its WBWRP.

In addition, reclaimed water, as available, would be used for cooling water (i.e., the make-up water used in cooling towers for commercial/industrial air conditioning systems), and

office building toilets. Such use of reclaimed water is designed to further reduce the Proposed Project's need for, and consumption of, potable water, beyond the reduction achieved through the implementation of water conservation measures and the use of reclaimed water for irrigation.

### **3.4 Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies four factors to be used in determining the significance of a project's impacts on water consumption (see Subsection 3.2, above). The first three factors have been established as the Proposed Project's significance thresholds. The fourth factor is a component of the first significance threshold in that it provides additional guidance in terms of describing a project's impact on water infrastructure improvements and provides guidance with regard to the methodology used in the analysis. Additionally, information regarding scheduled water infrastructure improvements is provided above in Subsection 2.2, Existing Conditions, while information regarding Project Design Features that reduce or offset service impacts is provided above in Subsection 3.3, Project Design Features.

The following analysis evaluates impacts of the Proposed Project. Because the Habitat Creation/Restoration Component would consume negligible amounts of water during operation, the Proposed Project's impacts result primarily from the implementation of the Urban Development Component.

#### **3.4.1 Construction Impacts**

During construction within the Urban Development Component, water would be used for dust suppression, the mixing and pouring of concrete, and other construction-related activities. In addition to development construction, the Proposed Project's Habitat Creation/Restoration component would require water for temporary irrigation during plant establishment. This temporary irrigation system would be designed to avoid over-irrigation of the slope areas included within the Proposed Project's bluff restoration program. It is not possible to quantify the water usage attributable to development construction and plant establishment activities with any level of certainty. Water usage for such purposes would, however, be temporary in nature and would not exceed that of the completed development.

Reclaimed water may be used for dust suppression, temporary irrigation, and various construction-related activities, reducing the use of potable water. It is unlikely that such water use would exceed the available supply, given the current and planned utilization of recycled "product" water serving the Proposed Project site and vicinity (i.e., recycled water customers currently consume only about 60 percent of the water treated at BWWRP, and planned expansions will meet, if not exceed projected demands). No significant impact is anticipated to

occur due to project construction activities because the water demands associated with such activities are not anticipated to exceed available supplies or distribution infrastructure.

### 3.4.2 Operational Impacts

Development within the Urban Development Component would consume water on a long-term basis. The water supply for the long-term operation of the Riparian Corridor would be from groundwater; therefore, the Riparian Corridor would not require ongoing consumption of potable or reclaimed water. As a result, the Proposed Project's ongoing use of potable and reclaimed water would be limited to that required to support the development proposed to occur within the Urban Development Component.

Table 163 through Table 167 on pages 1089 through 1091 indicate the daily amount of potable (average, maximum day, and peak hour) and reclaimed (office uses and landscape irrigation) water consumption of the Proposed Project at buildout.

With respect to the operation of uses proposed for the Proposed Project site, an estimated total of 0.50 mgd of potable water and 63,589 gpd of reclaimed water would be consumed on an average day, 0.86 mgd of potable water and 135,275 gpd of reclaimed water on a maximum day, and 1,048 gpm of potable water and 189 gpm of reclaimed water during the peak hour, as shown in Table 163 through Table 167 on pages 1089 through 1091. Based on LADWP's average water demand of 640 mgd projected for the year 2010, for which adequate water supplies are planned, the water consumption associated with the Proposed Project at buildout would represent approximately 0.08 percent of LADWP's future water demand. As indicated in LADWP's Water Supply Assessment for the Proposed Project (included as Appendix N-1b to this EIR) it is not anticipated that the total estimated water demand of the Project at buildout would exceed available supplies; hence, a less than significant impact on water supplies is anticipated.

The WBWRP, during fiscal year 2001-2002, sold 27,307 acre-feet (AF) to current customers, although they currently have the capacity to produce a total of approximately 46,485 AF per year. Given treatment capacity expansions planned to be implemented prior to 2010, the projected supply from WBWRP at Project buildout would be 54,000 AF per year (48.2 mgd). As indicated above, the Project would consume approximately 0.06 mgd (about 64,000 gpd) of recycled water during normal operation, which represents approximately 0.1 percent of the available supply at Project buildout in 2010.<sup>491</sup> As such, LADWP and WBMWD, through the Westside Water Recycling Project, are anticipated to have sufficient reclaimed water supply to provide for the demands of the Proposed Project.

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<sup>491</sup> Nagle, Richard, *Manager of Water Quality, West Basin Municipal Water District, Personal Communication, January 16, 2003.*

Table 163

**PROPOSED PROJECT  
AVERAGE POTABLE WATER CONSUMPTION**

Land Use	Potable Water Consumption		
	Proposed Project	Potable Water Consumption Factor <sup>a</sup>	Projected Consumption
Residential (d.u.)	2,600	176 gpd/d.u.	457,600 gpd
Office (ksf)	175	165 gpd/ksf	28,875 gpd
Retail (ksf)	150	88 gpd/ksf	13,200 gpd
Civic/Inst. (ksf)	40	88 gpd/ksf	3,520 gpd
<b>Total</b>			<b>0.503 mgd</b>

*ksf = thousand square feet      du = dwelling units      gpd = gallons per day      mgd = million gallons per day*

<sup>a</sup> *Water consumption factors from City of LA Draft CEQA Thresholds Guide (1998), wastewater generation factor multiplied by 110 percent to account for evaporation and absorption losses.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Table 164

**PROPOSED PROJECT  
RECLAIMED WATER USAGE (LANDSCAPE)**

Land Use <sup>a</sup>	Reclaimed Water Consumption		
	Proposed Project	Reclaimed Water Consumption Factor <sup>b</sup>	Projected Consumption
Landscaping (acres)	14.89	3,650 gpd/acre (average)	<b>54,349 gpd</b>
Landscaping (acres)	14.89	8,030 gpd/acre (maximum day)	<b>119,567 gpd</b>
Landscaping (acres)	14.89	11.4 gpm/acre (peak hour)	<b>170 gpm</b>

*gpd = gallons per day      gpm = gallons per minute*

<sup>a</sup> *Landscaped acreages determined using height district coverages, with most conservative (largest) amount of landscaped acreage.*

<sup>b</sup> *Factors are from Camp Dresser & McKee, Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities, Playa Vista Project," June 1990, updated June 1992.*

*Source: Camp Dresser & McKee, Inc., 2003.*



Table 165

**PROPOSED PROJECT  
RECLAIMED WATER USAGE (OFFICE AND TOTAL CONSUMPTION)**

Land Use	Proposed Project	Reclaimed Water Consumption	
		Potable and Reclaimed Water Consumption Factors <sup>a</sup>	Projected Consumption
<b>Average</b>			
Office (ksf)	175	53.0 gpd/ksf	9,275 gpd
Landscaping (acres)	14.89	3,650.0 gpd/acre	54,349 gpd
<b>Average Reclaimed Total<sup>b</sup></b>			<b>63,624 gpd</b>
<b>Maximum Day</b>			
Office (ksf)	175	90.1 gpd/ksf	15,768 gpd
Landscaping (acres)	14.89	8,030.0 gpd/acre	119,567 gpd
<b>Maximum Day Reclaimed Total<sup>b</sup></b>			<b>135,335 gpd</b>
<b>Peak Hour</b>			
Office (ksf)	175	0.1104 gpm/ksf	19 gpm
Landscaping (acres)	14.89	11.4 gpm/acre	170 gpm
<b>Peak Hour Reclaimed Total<sup>b</sup></b>			<b>189 gpm</b>

*ksf = thousand square feet      gpd = gallons per day      gpm = gallons per minute*

<sup>a</sup> Water usage factors for toilets and cooling towers are the wastewater generation factors from City of Los Angeles Draft L.A. CEQA Thresholds Guide (1998). Office factor includes 32 gpd per thousand square feet for office cooling towers and 21 gpd for toilet usage. Maximum Day factor is 1.7 times the average factor, and Peak Hour is 3 times the average factor.

<sup>b</sup> This number represents the combined reclaimed water usage from office cooling towers/toilets and landscape irrigation (sum of Table 164 and Table 165 consumption).

Source: Camp Dresser & McKee, Inc., 2003.

In order to accommodate the anticipated potable and reclaimed water demands, the construction of infrastructure improvements would be necessary. As described above in Subsection 2.2, Existing Conditions, LADWP is planning to install additional potable and reclaimed water supply mains to provide adequate water for the area, including the Proposed Project.<sup>492</sup> On-site distribution lines would be constructed to serve the proposed development and would be sized according to projected demands, including maximum day demands. In addition, LADWP has indicated that the Proposed Project requires the construction of an off-site regulator station south of Jefferson and Mesmer, and additional funding to be provided to LADWP to ensure the means for LADWP to provide a backup source of water (to be determined

<sup>492</sup> City of Los Angeles Department of Water and Power, Letter to Camp Dresser & McKee Inc. dated December 14, 1998, and subsequent telephone communication with Mr. Luis Nuno of the LADWP on March 29, 1999.

Table 166

**PROPOSED PROJECT  
MAXIMUM DAY POTABLE WATER CONSUMPTION**

Land Use	Proposed Project	Potable Water Consumption	
		Potable Water Consumption Factor <sup>a</sup>	Projected Consumption
Residential (d.u.)	2,600	299 gpd/d.u.	777,400 gpd
Office (ksf)	175,000	281 gpd/ksf	49,175 gpd
Retail (ksf)	150,000	150 gpd/ksf	22,500 gpd
Civic/Inst. (ksf)	40,000	150 gpd/ksf	6,000 gpd
<b>Total</b>			<b>0.86 mgd</b>

*ksf = thousand square feet du = dwelling units gpd = gallons per day mgd = million gallons per day*

<sup>a</sup> *Water consumption factors are derived from the wastewater generation factors from City of L.A. Draft CEQA Thresholds Guide (1998), multiplied by 110 percent. Multiplied average consumption factor by LADWP Maximum Day peaking factor of 1.7.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Table 167

**PROPOSED PROJECT  
PEAK HOUR POTABLE WATER CONSUMPTION**

Land Use	Proposed Project	Potable Water Consumption	
		Potable Water Consumption Factor <sup>a</sup>	Projected Consumption
Residential (d.u.)	2,600	528 gpd/d.u.	953 gpm
Office (ksf)	175,000	495 gpd/ksf	60 gpm
Retail (ksf)	150,000	264 gpd/ksf	28 gpm
Civic/Inst. (ksf)	40,000	264 gpd/ksf	7 gpm
<b>Total</b>			<b>1,048 gpm</b>

*ksf = thousand square feet du = dwelling units gpd = gallons per day gpm = gallons per minute*

<sup>a</sup> *Water consumption factors from City of L.A. Draft CEQA Thresholds Guide (1998). Factors are derived from the wastewater generation factors (multiplied by 110 percent), then multiplied by the LADWP Peak Hour peaking factor of 3. Gallons per day (gpd) are divided by 24 hours (per day) and then by 60 minutes (per hour) to derive gallons per minute (gpm) flow.*

*Source: Camp Dresser & McKee, Inc., 2003.*

by LADWP at a later date) in the event of disruption in water delivery in the region. (Appendix N-1c of this EIR.) With the implementation of these planned improvements, development of the Proposed Project site would not exceed water distribution infrastructure capabilities; therefore, no significant impact to such facilities would occur.

As discussed previously, the planning for future water supplies to meet regional needs is based primarily on SCAG regional growth projections. The Proposed Project is within the SCAG regional growth projections. Furthermore, Project-associated growth would not conflict with or exceed projections contained in the Westchester-Playa del Rey Community Plan (see Section IV.J, Population, Housing, and Employment, of the EIR, for a discussion of applicable plans, projected growth, and the Proposed Project's conformance with those projections). As such, the potable water demand associated with development of the Proposed Project has been accounted for in existing water supply planning programs at the local and regional level. Also, as noted above, the water consumption for the Proposed Project would not exceed the available supply. Based on the information provided above, the Proposed Project would result in a less than significant impact as it does not exceed SCAG's regional projected employment, housing or population growth projections or those of the Westchester-Playa del Rey Community Plan as assumed in the planning for future water infrastructure needs.

In summary, implementation of the Proposed Project would not result in significant impacts related to water consumption. The total estimated potable water demand for the Proposed Project at buildout is not anticipated to exceed available supplies planned by LADWP. With implementation of water distribution system improvements currently planned by LADWP, the water service needs for the Proposed Project would not exceed distribution infrastructure capabilities. Development of the Proposed Project would not exceed the growth projections of the Westchester-Playa del Rey Community Plan, as such projections were used in the planning for future water supplies to meet regional needs. Additionally, the Proposed Project includes a number of water conservation design features that reduce or offset water service impacts. Such features include, but are not limited to, requirements for the use of water efficient appliances and flow control devices, as well as the use of reclaimed water for irrigation and for certain aspects of non-residential building operations.

### **3.5 Equivalency Program Impacts**

The preceding analysis addresses impacts associated with construction and operation of the Proposed Project relative to water consumption, namely, the adequacy of potable and reclaimed water supplies and distribution infrastructure. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

Water consumption impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased water consumption impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to distribution infrastructure (potable and reclaimed water infrastructure) under the

Equivalency Program would be similar to the Proposed Project, as LADWP oversight of design and planning of water distribution infrastructure under the Equivalency Program (i.e., to ensure system adequacy) would still occur. Reclaimed water consumption impacts during operation of land uses under the Equivalency Program would be reduced relative to the Proposed Project, given the same landscaped area but reduced office uses, which would consume proportionately less reclaimed water for toilets and cooling towers. Additionally, based on the fact that the allowable number of assisted living units under the Equivalency Program (i.e., 200 units) would result in a maximum population growth of 240 persons (i.e., 1.2 persons per unit on average), the growth projected to occur under the Equivalency Program would essentially be comparable to that of the Proposed Project. As such, construction impacts, as well as operational impacts related to distribution infrastructure, reclaimed water supply, and consistency with applicable land use plans would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since the total estimated water demand at buildout would not exceed available reclaimed water supplies or potable/reclaimed distribution infrastructure capabilities, and would not exceed the projected employment, housing, or population growth projections of the applicable Community Plan as assumed in the planning for future water infrastructure needs.

Operational potable water consumption under the Equivalency Program would, under some development scenarios (i.e., variations in office, retail, and assisted living development patterns, while residential and community-serving would be unchanged), result in greater potable water supply impacts than under the Proposed Project. As shown in Table 168 on page 1094, potable water consumption would increase under two of the three analyzed land use development scenarios under the Equivalency Program. The first scenario under the Equivalency Program (i.e., All Retail), in which no assisted living units would be developed and the reduced office uses would be transferred to retail development, would consume 0.487 mgd on an average day and 0.829 mgd on a maximum day, which represents a decrease of approximately 0.016 mgd and 0.026 mgd (3.1 percent decrease) for an average and maximum day, respectively, from Proposed Project consumption. Under the second scenario (i.e., All Assisted Living), in which retail uses would be equal to those under the Proposed Project, yet in which the maximum number of assisted living units are constructed and office uses are reduced, water consumption would be increased over that which would occur under the Proposed Project. As Table 168 illustrates, the All Assisted Living scenario would result in the consumption of 0.527 mgd on an average day and 0.895 mgd on a maximum day, which represents an increase of 0.024 mgd and 0.040 mgd (4.7 percent increase) over the Proposed Project, respectively. The analysis of the Equivalency Program also considered other equivalency scenarios in which some proportion of assisted living units and retail development would be constructed while office uses would be minimized (as in the first scenario). Under these equivalency scenarios, the amount of water consumption would vary depending on the amount of retail and assisted living units constructed. Based on an analysis of a number of different equivalency scenarios, the greatest water consumption would occur when the maximum number of assisted living units (i.e., 200 units) are constructed, due to the fact that such uses are more water-intensive than retail uses. As such, as illustrated in Table

Table 168

**AVERAGE AND MAXIMUM DAY POTABLE WATER CONSUMPTION – PROPOSED PROJECT AND EQUIVALENCY SCENARIOS**

Land Use	Consump- tion Factor	Equivalency Scenario: All Retail		Equivalency Scenario: All Assisted Living		Equivalency Scenario: Retail/Assisted Living	
		Amount of Develop- ment	Consump- tion	Amount of Develop- ment	Consump- tion	Amount of Develop- ment	Consump- tion
<b>Average Potable Water Consumption (gpd)</b>							
Residential (d.u.)	176	2,600	457,600	2,600	457,600	2,600	457,600
Office (ksf)	165	50	8,250	150.90	24,899	50	8,250
Retail (ksf)	88	206.832	18,201	150	13,200	195.877	17,237
Community Serving (ksf)	88	40	3,520	40	3,520	40	3,520
Assisted Living (units/rooms)	137.5	0	0	200	27,500	200	27,500
<b>Total</b>			<b>487,571</b>		<b>526,719</b>		<b>514,107</b>
Proposed Project			503,195		503,195		503,195
<b>Over/(Under) Proposed Project</b>			<b>(15,624)</b>		<b>23,524</b>		<b>10,912</b>
<b>Maximum Day Potable Water Consumption (gpd)</b>							
Residential (d.u.)	299	2,600	777,400	2,600	777,400	2,600	777,400
Office (ksf)	281	50	14,050	150.90	42,403	50	14,050
Retail (ksf)	150	206.832	31,025	150	22,500	195.877	29,382
Community Serving (ksf)	150	40	6,000	40	6,000	40	6,000
Assisted Living (units/rooms)	234	0	0	200	46,800	200	46,800
<b>Total</b>			<b>828,475</b>		<b>895,103</b>		<b>873,632</b>
Proposed Project			855,075		855,075		855,075
<b>Over/(Under) Proposed Project</b>			<b>(26,600)</b>		<b>40,028</b>		<b>18,557</b>

Notes: gpd = gallons per day mgd = million gallons per day ksf = thousand square feet d.u. = dwelling unit

Source: Camp Dresser & McKee, Inc., 2003.

168, the water consumption under the Retail/Assisted Living scenario of the Equivalency Program would be 0.514 mgd on an average day and 0.874 on a maximum day, which represents an increase of 0.011 mgd and 0.019 mgd (2.2 percent increase) over the Proposed Project.

Overall, based on the fact that, compared to the Proposed Project, the fluctuations in potable water consumption under all development scenarios of the Equivalency Program are equal to or less than 4.7 percent, the impacts relative to the Proposed Project are not substantial. Furthermore, implementation of applicable Project Design Features (as discussed above in Subsection 3.3, Project Design Features) and Project mitigation measures would minimize potable water consumption to the maximum extent practicable. As such, the total estimated potable water demand at buildout would not exceed available potable water supplies or

distribution infrastructure capabilities, and impacts under the Equivalency Program, as is the case with the Proposed Project, would be less than significant.

### **3.6 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in the mitigation section below, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These off-site improvements are all located in developed urban areas. All of the off-site improvements, with the exception of the water regulator station, would occur within, or adjacent to, existing roadways. The water regulator station includes a small amount of above-ground piping equipment, a common element of the urban environment. Implementation of the Project's mitigation measures does not involve the construction of any buildings.

Construction of the proposed off-site traffic improvements would not require significant quantities of potable or reclaimed water, with the exception of water used for dust control. Operation of the proposed improvements would not consume potable or reclaimed water supplies. As such, construction and operation of the roadway improvements would not require new water supply or distribution facilities or infrastructure, or necessitate expansion of such facilities/infrastructure. Further, the proposed improvements would not add permanent residential or employment population and, therefore, would not increase the demand for, or consumption of, water. While construction activities would require the use of water, the amount would not be significant so as to reduce the overall amount of water available for public water supplies. No significant impact is expected, and no mitigation measures would be required.

As such, construction and operation of proposed off-site improvements would result in less than significant water consumption impacts, as the total estimated water demand for the Project at buildout would not exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure), and would not exceed the projected employment, housing, or population growth projections of the applicable Community Plan as assumed in the planning for future water infrastructure needs.

## 4.0 MITIGATION MEASURES

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of any building permit, on and off-site water infrastructure for potable and recycled water necessary for the development approved under such permit shall be constructed or suitably guaranteed, satisfactory to the City of Los Angeles' Department of Water and Power, Department of Public Works, and Department of Transportation; California Department of Health Service and Department of Transportation (Caltrans); and the West Basin Municipal Water District, as applicable. Off-site water infrastructure shall consist of construction of a regulator station south of the Jefferson Boulevard/Mesmer Street intersection and provision of design and construction fees to provide a back-up source of emergency water supply to serve the project area.
- The Project shall install low-flow toilets, low-flow showerheads, low-flow fixtures, and Energy Star-rated appliances (dishwashers and washing machines, if built in), where applicable.
- In office, retail, and other public buildings, water faucet fixtures with activators shall be installed that automatically shut off the flow of water when not in use.
- If available, reclaimed water shall be used for irrigation, office building toilet flushing, and office building cooling towers.
- Compliance with all applicable water conservation ordinances (No. 170,978 and subsequent ordinances) shall be required.
- Automatic sprinkler systems shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

The total estimated water demand for the Project at buildout, inclusive of the Project's Equivalency Program and off-site improvements, is not anticipated to exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure), or exceed the projected employment, housing, or population growth projections of the applicable Community Plan, as assumed in the planning for future water infrastructure needs. Therefore, no significant unavoidable adverse impacts relative to water consumption are expected to occur.

## 6.0 CUMULATIVE IMPACTS

As shown in Table 169 on page 1098, the projected potable water consumption for the Proposed Project in conjunction with that of cumulative projects within the LADWP service area and other background growth would be 4.81 mgd on an average day, 8.17 mgd on a maximum day, and 10,015 gpm during a peak hour. This would represent an increase of approximately 0.8 percent in LADWP's average daily water demand of 640 mgd (daily average consumption, normal year) projected for the year 2010. The Project's Equivalency Program would create a maximum additional average and maximum day potable water demand of 23,524 gpd and 40,028 gpd, respectively, which represents an increase of 0.5 percent. Detailed calculation spreadsheets of water consumption for the cumulative projects are presented in (Appendix N-1a of this EIR).

Major improvements necessary to provide adequate service to the Proposed Project have been previously identified by LADWP; as such off-site water system infrastructure is anticipated to be adequate to meet the water demands of the Proposed Project, including the Project's Equivalency Program and off-site improvements, by 2010. It is uncertain, however, if such improvements have also been identified for the cumulative projects and other background growth addressed herein, since many of the related projects are located outside of the LADWP service area. As such, development of the cumulative projects and other background growth would have a potentially significant impact on the local infrastructure. However, this impact would be mitigated by the City requirement that, prior to issuance of a building permit, all projects must demonstrate that adequate distribution infrastructure exists to serve projected demand; if such adequacy cannot be demonstrated by the project applicant, the project cannot connect to the LADWP water distribution system, thereby avoiding a significant impact. As discussed previously, the planning for future water supplies to meet regional needs is based primarily on growth assumptions reflected in local general plans. The level of development associated with the cumulative projects is within SCAG regional growth projections for the area. As such, the potable water demand associated with such development has been accounted for in existing regional water supply planning programs, and no significant cumulative impact to regional water supply is considered to occur. However, at the local level, the population, housing, and employment growth projections reflected in the applicable Community Plan (i.e., the Westchester-Playa del Rey Community Plan) would be exceeded in 2010 by 77.4 percent, 149.9 percent, and 73.0 percent, respectively, based on the growth associated with the Proposed Project and other related projects within the Community Plan area. (see Section IV.J, Population, Housing, and Employment for a detailed discussion of growth projections). Therefore, although no significant cumulative impact to regional water supply would occur, the cumulative impacts of the Proposed Project, including the Equivalency Program, relative to local population growth



Table 169

## CUMULATIVE WATER CONSUMPTION

	Land Use					Potable Water Consumption (mgd)				
	Proposed Project	Related Projects within LADWP Service Area*	Back-ground Growth	Proposed + Related Projects + Background Growth	Consumption Factor <sup>b</sup>	Units	Proposed Project	Related Projects within LADWP Service Area*	Back-ground Growth	Proposed + Related Projects + Background Growth
Residential(d.u.)	2,600	5,718	2,080	10,398	176	gpd/d.u.	0.458	1.006	0.366	1.830
Office (s.f.)	175,000	5,918,796	609,380	6,703,176	0.165	gpd/s.f.	0.029	0.977	0.101	1.106
Retail (s.f.)	150,000	726,564	87,656	964,220	0.088	gpd/s.f.	0.013	0.064	0.008	0.085
Hotel (rooms)	0	1,650	165	1,815	143	gpd/room	0.000	0.236	0.024	0.260
Civic/Inst. (s.f.)	40,000	389,300	42,930	472,230	0.088	gpd/s.f.	0.004	0.034	0.004	0.042
Warehouse (s.f.)	0	190,000	19,000	209,000	0.022	gpd/s.f.	0.000	0.004	0.000	0.005
Restaurant (s.f.)	0	60,909	6,091	67,000	1.012	gpd/s.f.	0.000	0.062	0.006	0.068
Theater (seats)	0		0	0	4.4	gpd/seat	0.000	0.000	0.000	0.000
Industrial (s.f.)	0	14,593,500	1,459,350	16,052,850	0.088	gpd/s.f.	0.000	1.284	0.128	1.413
Parking (spaces)	0	1,815	182	1,997	0	gpd/space	0.000	0.000	0.000	0.000
<b>Total (Average)</b>							<b>0.503</b>	<b>3.667</b>	<b>0.637</b>	<b>4.807<sup>c</sup></b>
<b>Total (Max Day)</b>										<b>8.172<sup>c</sup></b>
<b>Total (Peak Hour) (gpm)</b>										<b>10,015</b>

*gpd* = gallons per day      *gpm* = gallons per minute      *mgd* = million gallons per day      *d.u.* = dwelling unit      *s.f.* = square feet

Consumption factors are derived from the City of Los Angeles Draft CEQA Thresholds Guide (1998), using wastewater generation factors, multiplied by 110 percent to account for evaporation/absorption losses

\* Related projects within the LADWP service area would utilize the same collective water supply sources, which are the basis for cumulative impacts analysis; all such projects are those within the City of Los Angeles, which are assumed to be served by LADWP.

<sup>a</sup> Background growth adds 25 percent for residential development and 10 percent for non-residential development (all other uses) to consumption/generation totals to account for growth of related projects that are not subject to environmental review. In other words, residential consumption/generation rates are 25 percent higher and all other rates are 10 percent higher than would otherwise be quantified. See Appendix N-1a for detailed background growth calculations.

<sup>b</sup> Generation/consumption factors were derived assuming 23 ft<sup>2</sup> for each theater seat, 33 ft<sup>2</sup> for each restaurant seat, 850 ft<sup>2</sup> for each hotel room, 212 ft<sup>2</sup> for each school student, and 154 ft<sup>2</sup> for each parking space. See Appendix N-4 for detailed factor derivations.

<sup>c</sup> Under the Project's Equivalency Program, the total cumulative potable water consumption under average and maximum day conditions would increase by a maximum of 23,524 gpd and 40,028 gpd, respectively, which represents an increase of 0.5 percent over the total cumulative consumption of 4.807 mgd (average) and 8,172 mgd (max day).

Source: Camp Dresser & McKee Inc. 2003

would be considered significant. The Project's off-site improvements would not create additional population or induce population growth directly or indirectly, and would therefore not result in any impacts on water consumption. As such, cumulative impacts associated with off-site improvements would be less than significant.

As discussed in Subsection 2.1, Regulatory Framework, LADWP, as a public water service provider, is required to prepare and periodically update a UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610 (Costa) and SB 221 (Keuhl), LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area. The types of projects subject to the requirements of SB 610 and SB 221 tend to be larger projects (i.e., residential projects with more than 500 dwelling units, shopping centers employing more than 1,000 persons or having more than 500,000 square feet of floor space, commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc.) that may, or may not have, been included within the growth projections of the UWMP. The water supply assessment for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and how they would be secured if needed. Given that the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through projects such as those identified in Table 169 on page 1098, and that the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects have been carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP will be able to supply the demands of the Proposed Project and related projects through 2010 and beyond.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**N. UTILITIES**  
**(2) WASTEWATER**

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**1.0 INTRODUCTION**

This section addresses the potential impacts of the Proposed Project on local and regional wastewater facilities and infrastructure. The Project's consistency with adopted wastewater plans and policies is also addressed. The analysis estimates and compares the demand for service to the capacity of the existing and proposed collection, conveyance, and treatment facilities. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures. The impacts associated with stormwater runoff, as may be considered a form of wastewater, are addressed in Section IV.C, Water Resources, of this EIR.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Regulatory Framework**

The City of Los Angeles Department of Public Works (LADPW), Bureau of Sanitation, is the wastewater collection and treatment agency serving the Proposed Project site, and regulates the acceptance of wastewater into the collection system.

In 1990, City Ordinance No. 166,060 (also known as the Sewer Allocation Ordinance) was adopted, which established sewer permit allocation regulations for projects that discharge into the Hyperion Treatment System (HTS). The ordinance established an annual sewage allotment of 5 million gallons per day (gpd), of which 34.5 percent (1,725,000 gpd) is allocated for priority projects, 8 percent (400,000 gpd) for public benefit projects, and 57.5 percent (2,875,000 gpd, with a monthly allotment of at least 239,583 gpd) for non-priority projects (of which 65 percent of this allocation is for residential and 35 percent to non-residential projects).<sup>493</sup>

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<sup>493</sup> **Priority Projects** are projects which meet certain criteria specified in Section 4 of the ordinance, such as a residential or commercial/industrial project located within both a Community Plan Area and a Master Environmental Impact Report Area with a jobs/housing ratio of 1.74 or more for residential or 1.10 or less for commercial/industrial, an emergency trauma center and/or non-profit hospital, an affordable rental housing project, and a single family dwelling, to name a few. **Public Benefit Projects** are determined by the City Council as projects that will benefit the public health, safety or otherwise provide a public benefit. **Non-Priority Projects** are granted allocations in the order of their applications.

Before the Department of Building and Safety formally accepts a set of plans and specifications for a project for plan check, LADPW must first determine if there is allotted sewer capacity available for such project. LADPW will not make such a determination until the Department of Building and Safety has determined that the Project's plans and specifications are acceptable for plan check. If LADPW determines that there is allotted sewer capacity available for the project, then the Department of Building and Safety will accept the plans and specifications for plan check upon the payment of plan check fees. If a project is eligible to receive an allocation as a non-priority project, and the monthly allotment has been used, then the project is placed on a waiting list for the next month's allotment. At the request of the project applicant, the Department of Building and Safety will accept the project's plans and specifications as acceptable for plan check even if the project has been placed on the waiting list and a sewer permit has not yet been obtained from LADPW, with the understanding that the project will not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued.

City Ordinance No. 171,036, effective June 3, 1996, changed the rate structure for new and expanded development to be based upon the strength of the wastewater flow in addition to its volume. The determination of wastewater strength for each applicable project is based upon City guidelines for average wastewater concentrations of two parameters, Biological Oxygen Demand and suspended solids, for each type of land use.

## **2.2 Existing Conditions**

### **2.2.1 Proposed Project Site**

As most of the Proposed Project site is vacant land, a minimal amount of wastewater is currently being generated. There are two large buildings currently located on the Proposed Project site, Building 22 and Building 45, and various minor sheds and storage buildings at the former Salvage Yard area, which remain from the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant. Building 22 is a 5,500+ sq.ft. warehouse used for storage, and as such generates minimal quantities of wastewater. Building 45 consists of approximately 43,500 sq.ft. and is presently used intermittently for filming and other short-term activities (e.g., production-related activities and storage); hence, it also generates minimal quantities of wastewater. Construction trailers associated with the construction of the adjacent Playa Vista First Phase Project are also located within the Proposed Project site and currently generate minimal amounts of wastewater. All wastewater flows from the various buildings within the Proposed Project site are conveyed through existing on-site sewer infrastructure to the existing 24-inch sewer in Jefferson Boulevard.

## 2.2.2 Wastewater Collection Systems

The City provides sewer service to all areas within the City boundary. This would include the entire Proposed Project site. The wastewater collection system serving the City and its contracting agencies consists of approximately 6,500 miles of pipe ranging in size from 6 inches to 150 inches. The system also includes approximately 170 miles of outfall sewers and major interceptors. There are approximately 48 pumping plants integrated into the collection system, which lift sewage from low elevations to higher elevations within the system.<sup>494</sup>

Figure 95 on page 1103 shows the Regional Wastewater Facilities as they relate to the Proposed Project site. The North Outfall Sewer (NOS) is the closest existing interceptor sewer line to the Proposed Project site. It is one of four major sewers used to convey wastewater directly to the Hyperion Treatment Plant (HTP). As shown in Figure 95, the pipeline extends north from the HTP along Vista del Mar, turns northeasterly, parallel the Playa del Rey and Westchester Bluffs (also known as the Ballona Escarpment) following Cabora Road through the Proposed Project site (along the southern edge of the Westchester Bluffs) and to the northeast along adjacent properties, until it passes under the San Diego Freeway near its interchange with the Marina Freeway.

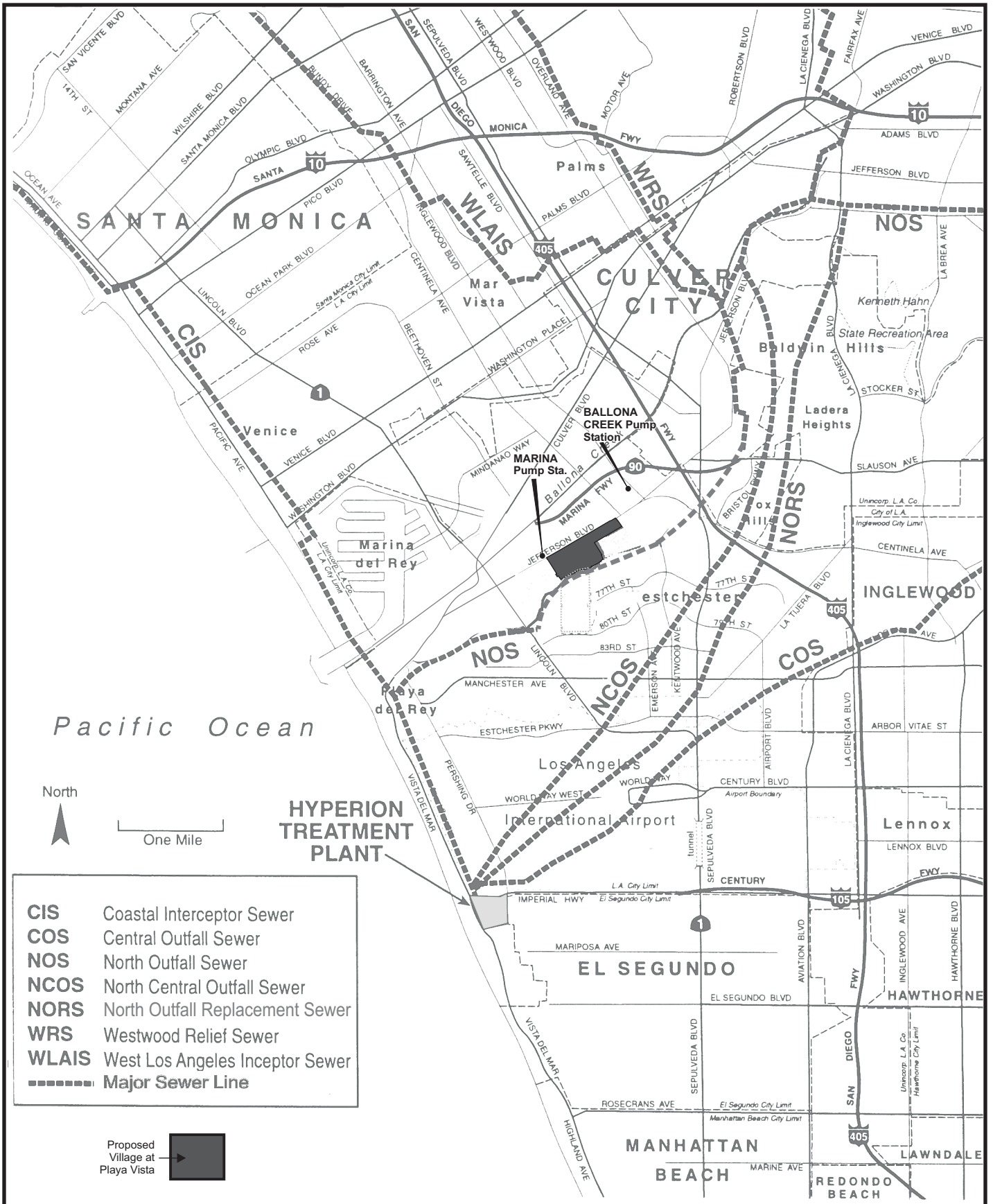
The lower section of the NOS was constructed during the 1920s. This pipeline section is semi-elliptical in shape, measuring approximately 126 inches in height by 147 inches in width in the vicinity of the Proposed Project site. A portion of this pipeline is within the Proposed Project's Habitat Creation/Restoration Component area. The NOS is currently not in service with the exception of some local flows that cannot be bypassed. This is in anticipation of rehabilitation of the lower segment of the NOS, which is expected to be completed by 2006.<sup>495</sup>

Another major interceptor sewer in the general vicinity of the Proposed Project site is the North Central Outfall Sewer (NCOS), which is 96 to 114 inches in diameter. As shown on Figure 95, the NCOS is the major sewer that runs east and south of the Proposed Project site.

Several collection system improvements proposed by the City to accommodate anticipated growth through the year 2010 include additions, repairs, and replacements of sewer lines within HTS (the HTS includes the HTP, the Los Angeles-Glendale Water Reclamation Plant [LAGWRP], and the Tillman Water Reclamation Plant [TWRP]). One of the largest of these projects is, as mentioned above, the rehabilitation of the lower segment of the NOS. The major sewer most relevant to the Proposed Project site is the NCOS, which currently has excess

<sup>494</sup> City of Los Angeles, *Final Environmental Impact Report, Playa Vista First Phase (#90-0200-SUB (C) (CUZ) (CUB))*, May 1993.

<sup>495</sup> Crehan, Michael, Engineer, Psomas. Letter to CDM, "Playa Vista Phase 2 Wastewater," February 18, 2003.



SOURCE: PSOMAS

Figure 95  
Regional Wastewater Facilities



capacity (i.e., existing actual flows are substantially less than the design capacity). The NCOS has a full flow capacity of 244 million gallons per day (mgd) (“full flow” is the maximum volume of wastewater that the pipeline can convey, while “design flow” is the volume of wastewater that the pipeline was designed to convey, which is a flow height of  $\frac{3}{4}$  of the pipeline height).<sup>496</sup> The NCOS currently conveys an average daily (dry weather) flow of 97 mgd and a maximum daily (peak dry weather) flow of 146 mgd. Future average and peak dry weather flows in the NCOS in 2010 are projected to be 64 mgd and 100 mgd, respectively, which is well within the sewer’s flow capacity.<sup>497</sup> This reduction in flow is due to the re-routing of flows to the NOS after its anticipated rehabilitation in 2006.

Two pumping stations are located near the Proposed Project site: the Ballona Creek Pump Station and the Marina Pump Station. The Ballona Creek Pump Station, located at 5550 Inglewood Boulevard, generally collects flows from north of Jefferson Boulevard, west of the San Diego Freeway and west of Inglewood Boulevard. The Ballona Creek Pump Station has a design capacity of 25.9 mgd, with current average and peak dry weather flows of 2.9 mgd and 6.0 mgd, respectively. The Marina Pump Station is located at 12921 West Jefferson Boulevard and has a present capacity of 7.2 mgd. This station collects flows from the immediate area north of Jefferson Boulevard as well as from a collection area north of Ballona Channel in the Marina del Rey area, receiving flows from both the City and the County areas. The Marina Pump Station currently discharges into the NOS, and average and peak dry weather flows at the pump station are approximately 1.3 mgd and 2.1 mgd, respectively.<sup>498</sup>

A new 42” sewer, the Marina Interceptor Sewer (MIS) is currently under construction. The MIS will drain to the NCOS. Once the MIS line is operational, the flows from the Marina Pump Station will be diverted to the Ballona Creek Pump Station, and the Marina Pump Station will be taken off line and demolished.<sup>499</sup> It is anticipated that completion of the MIS will occur before mid-2003, as will the decommissioning and demolition of the Marina Pump Station.<sup>500</sup> At such time as the MIS is completed and the Marina Pump Station is demolished, all flows from the Proposed Project site will be diverted from the NOS to the NCOS.<sup>501</sup>

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<sup>496</sup> City of Los Angeles, *Integrated Plan for the Wastewater Program – Volume I: Report*, November 2001.

<sup>497</sup> Crehan, Michael, Engineer, Psomas, letter to CDM, “Playa Vista Phase 2 Wastewater,” February 18, 2003.

<sup>498</sup> Crehan, Michael, Engineer, Psomas, letter to CDM, “Playa Vista Phase 2 Wastewater,” February 18, 2003.

<sup>499</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Board Report: Ballona Creek Pumping Plant (654) Upgrade, Contract No. C99927 (W.O. No. E20002413)*, July 6, 2001.

<sup>500</sup> Doty, James, Bureau of Engineering, Department of Public Works, City of Los Angeles, e-mail communication, November 6, 2002.

<sup>501</sup> Crehan, Michael, Engineer, Psomas, letter to CDM, “Playa Vista Phase 2 Wastewater,” February 18, 2003.

Currently, all wastewater flows from the Proposed Project site are conveyed through existing on-site sewer infrastructure to an existing 24-inch trunk sewer in Jefferson Boulevard, which has a full flow capacity of 6.0 mgd and current average and peak flows of 1.3 mgd and 2.1 mgd, respectively. The 24-inch sewer currently conveys flows to the Marina Pump Station. As noted above, flows to the Marina Pump Station are proposed to be diverted to the Ballona Creek Pump Station in conjunction with completion of the new 42-inch sewer (the MIS) in Jefferson Boulevard. The new 42-inch MIS has a design capacity of 25.9 mgd, and operable sections (i.e., those sections located east of the Marina Pump Station) currently convey average and peak dry weather flows of 2.9 mgd and 6.0 mgd, respectively. Flows from the Ballona Creek Pump Station would be conveyed to the NCOS through an existing 36-inch force main, which has a design capacity of 25.9 mgd, and existing average and peak flows of 2.9 mgd and 6.0 mgd, respectively. It should be noted that the MIS, Ballona Creek Pump Station, and 36-inch force main are designed to operate together as a unit; as such, the flow capacities are all equal (i.e., the MIS is the Ballona Creek Pump Station's only inlet, and the 36-inch force main is the pump station's only outlet, yielding an identical flow capacity of 25.9 mgd). As described above, flows in the NCOS, located in Sepulveda Boulevard south of Centinela Avenue, would be conveyed to HTP.

### 2.2.3 Wastewater Treatment Facilities

HTP is located in Playa del Rey and treats wastewater from most of the City of Los Angeles as well as Santa Monica, Culver City, unincorporated portions of Los Angeles County, and an additional 24 agencies. These cities and agencies are under contract with the City of Los Angeles for wastewater treatment at the City's facilities.

As of April 2002, HTP treats an average dry weather flow of approximately 331 mgd, within a design capacity of 450 mgd.<sup>502</sup> All flows receive secondary treatment using the activated sludge process. HTP effluent is presently discharged into Santa Monica Bay through two outfalls. Both the "Five Mile" and "One Mile" outfalls are 12 feet in diameter. The "Five Mile" outfall is 187 feet deep (landside – as measured at the land site prior to extending seaward) and is used on a regular basis. The "One Mile" outfall is 50 feet deep (landside) and is used on an emergency basis only.<sup>503</sup> The biosolids (sludge) resulting from the treatment process are biologically digested and dewatered. As of December 2001, the HTP produced an average of 82,000 dry tons of biosolids per year, approximately 85 percent of which was applied as a soil amendment to non-food crops at the City of Los Angeles' 4,688-acre Green Acres Bio-Farm in Kern County, and the remainder of which was used for composting at City's Griffith Park

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<sup>502</sup> O'Hara, Kim, *City of Los Angeles Department of Public Works, Bureau of Sanitation, Personal Communication, May 17, 2002.*

<sup>503</sup> *City of Los Angeles, Final Environmental Impact Report, Playa Vista First Phase (#90-0200-SUB (C) (CUZ) (CUB)), May 1993.*



Composting Facility or applied as a soil amendment on other non-food crops in Riverside County.<sup>504</sup>

Two inland water reclamation plants within the HTS service area (LAGWRP and TWRP) provide hydraulic relief for downstream interceptor facilities and the HTP. In addition, these plants allow for the reclamation and reuse of waters that would otherwise be sent to HTP, treated, and discharged into the ocean. LAGWRP, in the vicinity of the City of Glendale, has current treatment capacity for 20 mgd of wastewater and TWRP, in the Sepulveda Basin, has a current capacity of 80 mgd.<sup>505</sup> Both of these plants provide tertiary treatment for all dry weather flows, meeting Title 22 requirements for effluent discharge.

The maximum planned treatment capacity for average dry weather flows for the HTS, including future capacity from planned capacity expansions at HTP and the two inland water reclamation plants, is 761 mgd (511 mgd at HTP, 200 mgd at TWRP, and 50 mgd at LAGWRP).<sup>506</sup> This projected treatment capacity assumes that planned expansion phases of HTP, TWRP, and LAGWRP are completed prior to 2010. Such expansions would occur on current plant sites, within facility property lines, and in time to meet projected system demands. As discussed below, a planned capacity expansion of any of the three plants in the HTS would be sufficient to meet projected peak month wastewater treatment demands in 2010. Based upon population projections by the Southern California Association of Governments (SCAG), by 2010, wastewater flows to the HTS are expected to average an estimated 536 mgd over the year, and 570 mgd during a peak month.<sup>507</sup>

Even if treatment facilities were not expanded, the current HTS capacity of 550 mgd would be sufficient to treat projected average dry weather flows in 2010, yielding a surplus capacity of 14 mgd. During peak months, however, the capacity would be exceeded by 20 mgd, without facility improvements to at least one of the three plants. The planned expansion of even the smallest of the plants (LAGWRP) would yield an increase of 30 mgd of treatment capacity (i.e., from the existing capacity of 20 mgd to maximum capacity of 50 mgd), thus providing a minimum of 10 mgd capacity surplus (during peak flow months) in 2010. It is anticipated that the City will expand its wastewater facilities to meet projected demands, including planned capacity expansions at one, if not all three, treatment plants (see additional discussion below).

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<sup>504</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Biosolids Environmental Management System EMS Plan Executive Summary. December 12, 2001. From City website (www.ci.la.ca.us/SAN/biosolidsems/downloads\_ems\_manual/executive\_summary.pdf), accessed February 11, 2003.*

<sup>505</sup> *City of Los Angeles, Final Environmental Impact Report, Playa Vista First Phase (#90-0200-SUB (C) (CUZ) (CUB)), May 1993.*

<sup>506</sup> *Camp Dresser & McKee and CH2MHILL, Integrated Plan for the Wastewater Program – Volume 1: Report. Prepared for the City of Los Angeles, November 2001.*

<sup>507</sup> *Camp Dresser & McKee and CH2MHILL, Integrated Plan for the Wastewater Program – Volume 1: Tools. Prepared for the City of Los Angeles, June 2000.*

Policy 9.2.3 in the Los Angeles General Plan Framework EIR states that adequate treatment plant capacity will be developed as necessary.<sup>508</sup> The City plans for future wastewater management needs based on a 20-year horizon, at which the City's existing wastewater facilities plan, prepared in 1990, addresses future needs through the year 2010. The City of Los Angeles is currently developing an updated Wastewater Facilities Plan; the first, current phase of which is the development of an Integrated Plan for the Wastewater Program (IPWP). This plan assesses projected wastewater needs for Los Angeles, identifies various means and options available for meeting those needs, and develops a technical framework for development of policies and a facilities plan to meet wastewater management needs through the 2020 planning horizon. Based on IPWP projections, which are based on SCAG projections, estimated wastewater flows for the 2020 wastewater planning horizon year will exceed the existing average capacity at HTP.<sup>509</sup> Alternatives that the City of Los Angeles has for meeting its projected shortfall include combinations of increasing capacity at HTP, building new reclamation capacity upstream of HTP, conservation of potable water, and infiltration/inflow reduction. The IPWP planning effort is analyzing the projections to determine more precisely when the shortfall in capacity will occur, so that the most suitable options for improvements, and the phasing of those improvements, can be formulated to effectively meet Los Angeles' wastewater treatment needs through the planning horizon. The identification and evaluation of those options includes an extensive public improvement process.

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

Wastewater generation estimates were developed for long-term operational use based on land use generation factors developed by the City of Los Angeles for the *Draft L.A. CEQA Thresholds Guide*. As noted in Section IV.N.(1), Water Consumption, of this EIR, all wastewater generation factors are identical to water consumption factors with the exception of office uses. The wastewater generation factor includes the wastewater generated from the use of reclaimed water in cooling towers and toilets. The wastewater generation factors are summarized on Table 170 on page 1108.

During summer months, daily water demands, and therefore wastewater generation, by some uses are significantly higher than during winter. Peak day demands normally occur during

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<sup>508</sup> *Envicom Corp., City of Los Angeles Citywide General Plan Framework, December 1996.*

<sup>509</sup> *City of Los Angeles, Department of Water and Power, Integrated Plan for the Wastewater Program, Baseline Needs Technical Memorandum, April 2000.*

Table 170

## WASTEWATER GENERATION FACTORS

Land Use	Average Generation Factor
Residential <sup>a</sup>	160 gpd/d.u.
Office <sup>b</sup>	203 gpd/ksf
Retail	80 gpd./ksf
Civic/Institutional <sup>c</sup>	80 gpd/ksf

d.u. = dwelling unit      gpd = gallons per day      ksf = thousand square feet

<sup>a</sup> Residential wastewater generation factor is the average value of factors for studio, 1 bedroom, 2 bedroom, 3 bedroom, and 4 bedroom housing units, or 160 gpd. Using the average factor of 160 gpd for all dwelling units results in a more conservative assessment of wastewater generation.

<sup>b</sup> Office factor includes 53 gpd of wastewater generation from operation of cooling towers and toilets.

<sup>c</sup> The community center factor presented in the City of L.A. CEQA Guide is based upon the number of occupants and applies specifically to community center uses. As the civic/institutional facilities in the Urban Development Component will include a community center, which is similar in intensity and use as retail facilities, the retail factor was used to calculate projected wastewater generation.

Source: City of Los Angeles, "Draft L.A. CEQA Thresholds Guide," May 14, 1998.

the hot summer days. Peak day wastewater flows (peak dry weather flows) were determined using a peaking factor of 2.4.<sup>510</sup>

Most of the wastewater generation factors are applied to the square footage of a particular land use.

### 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p. K.2-3) states that a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

<sup>510</sup> Psomas, "Playa Vista Tract 49104 – Sewer Calculations and Report," December 12, 1995.

### 3.3 Project Design Features

The Proposed Project would implement several water conservation methods (such as ultra low-flow toilets, low-flow fixtures, and water saving appliances), as discussed in Section IV.N.(1), Water Consumption, Subsection 3.3, Project Design Features, of this EIR, which would result in the generation of less wastewater, compared to similar existing land uses.

### 3.4 Project Impacts

Because the Project's Habitat Creation/Restoration Component would not generate wastewater, the impacts discussion below for the Proposed Project pertains to wastewater impacts of the Urban Development Component.

During construction of the Proposed Project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Therefore, no significant impact is expected to occur. As such, construction impacts to the local wastewater conveyance and treatment system would be less than significant and no mitigation is required.

Table 171 on page 1110, indicates the Proposed Project's daily average and peak dry weather wastewater generation.

With respect to the operation of uses proposed for the Proposed Project site, an estimated average total of 0.47 mgd and a peak flow of 1.12 mgd of wastewater would be generated, as shown in Table 171. These projected wastewater flows would be conveyed to the existing facilities operated by the LADPW, Bureau of Sanitation, which has indicated that it will serve the Proposed Project's wastewater collection and treatment needs (See Appendix N-2d for correspondence from the Bureau of Sanitation).<sup>511</sup> Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The on-site and other local sewers would convey wastewater via the Ballona Creek Pump Station to the NCOS, which is projected to have

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<sup>511</sup> Tamini, Belal B., City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater Division. Personal Communication, e-mail correspondence regarding "Will-Serve" Letter Request for Village at Playa Vista Project, May 20, 200.

Table 171

## PROPOSED PROJECT WASTEWATER GENERATION

	Land Use	Average Dry-Weather Generation Factor <sup>a</sup>	Average Dry-Weather Flow (gpd)	Peak Dry-Weather Generation Factor <sup>b</sup>	Peak Dry-Weather Flow (gpd)
Residential (d.u.)	2,600	160 gpd/d.u.	416,000	384 gpd/d.u.	998,400
Office (sq.ft.)	175,000	0.203 gpd/sq.ft.	35,525	0.4872 gpd/sq.ft.	85,260
Retail (sq.ft.)	150,000	0.080 gpd/sq.ft.	12,000	0.192 gpd/sq.ft.	28,800
Civic/Inst. (sq.ft.)	40,000	0.080 gpd/sq.ft.	3,200	0.192 gpd/sq.ft.	7,680
<b>Totals (mgd)</b>			<b>0.47</b>		<b>1.12</b>

sq.ft. = square feet      d.u. = dwelling units      gpd = gallons per day      mgd = million gallons per day

<sup>a</sup> Water consumption factors (used to derive wastewater generation) from the Draft City of L.A. CEQA Thresholds Guide (1998). Residential wastewater generation factor is the average value of factors for studio, 1 bedroom, 2 bedroom, 3 bedroom, and 4 bedroom housing units, or 160 gpd. Using the average factor of 160 gpd for all dwelling units results in a more conservative assessment of wastewater generation (i.e., 0.40 mgd using respective residential factors, compared to 0.47 mgd using the average factor).

<sup>b</sup> Peak dry-weather flows were calculated using a peaking factor of 2.4 factor provided by Psomas.(Psomas, "Playa Vista Tract 49104 – Sewer Calculations and Report," December 12, 1995, included as Appendix N-2c of this EIR).

Source: Camp Dresser & McKee, Inc., 2003

substantial surplus capacity during peak months in 2010 (i.e., 144 mgd). The estimated 1.12 mgd peak wastewater generation for the Proposed Project, therefore, would use only about 0.8 percent of the projected available peak flow capacity (144 mgd) within the NCOS.

According to the Draft Los Angeles CEQA Thresholds Guide, a sewer's capacity is considered constrained if the depth of flow is equal to or greater than three-quarters of the sewer's diameter. Flows from the Proposed Project would be conveyed, via a network of new 8- to 15-inch on-site local sewer infrastructure, through multiple connections directly to the 42-inch MIS in Jefferson Boulevard. As indicated in Table 172 on page 1111, the MIS would have an available 2010 capacity of 13.6 mgd during peak months, and thus the 1.12 mgd peak flow from the Proposed Project would represent 8.2 percent of the sewer's capacity would thus not cause the MIS to become constrained. Flows in the MIS would be conveyed to the Ballona Creek Pump Station, which has a capacity of 25.9 mgd, and the available peak month capacity at the Ballona Creek Pump Station in 2010 is projected to be 17.5 mgd, as indicated in Table 172. As such, the projected 1.12 mgd of peak flow from the Proposed Project would represent 6.4 percent of the pump station's capacity, and therefore, would not cause the plant's capacity to become constrained. Flows from the Ballona Creek Pump Station would discharge into the 36-inch force main in Centinela Avenue and Sepulveda Boulevard. As indicated in Table 172, the 36-inch force main would also have an available 2010 peak month capacity of 17.5 mgd, and, therefore,

Table 172

**PROPOSED PROJECT  
WASTEWATER FLOWS (IN MGD) AND CONVEYANCE INFRASTRUCTURE**

Wastewater Facility	Existing ADWF	Existing PDWF	2010 ADWF	2010 PDWF	Full Flow Capacity	DesignFlow Capacity <sup>a</sup>	2010 Available Capacity <sup>b</sup>
MIS (42-inch) <sup>c</sup>	2.9	6.0	4.5	8.4	25.9	22	13.6
Ballona Creek Pump Station <sup>c</sup>	2.9	6.0	4.5	8.4	25.9	n/a	17.5
36-Inch Force Main <sup>c</sup>	2.9	6.0	4.5	8.4	25.9	n/a	17.5
NCOS <sup>d</sup>	97	146	64	100	244	154	54

mgd = million gallons per day ADWF = Average Dry Weather Flow PDWF = Peak Dry Weather Flow

Notes:

- <sup>a</sup> This calculation is based on the cross-sectional area of the pipeline. The design flow (or  $\frac{3}{4}$  flow height) capacity constraints apply only to gravity sewers, such as the MIS and NCOS; force mains and pump stations (e.g., the 36-inch force main and Ballona Creek Pump Station) convey wastewater under pressure, thus they are not constrained at  $\frac{3}{4}$  flow depth within the pipeline.
- <sup>b</sup> 2010 available capacity is based on interpolated flow data for 2020, as provided by the City of Los Angeles Department of Public Works, and represents the available flow capacity in respective system components during peak flow months, without causing the sewer to become constrained (i.e.,  $\frac{3}{4}$  height capacity, where applicable). This is calculated by subtracting the 2010 projected peak flows from the  $\frac{3}{4}$  height capacity (for gravity sewers) or the full flow capacity (for force mains and pump stations).
- <sup>c</sup> A portion of the MIS, located east of the Marina Pump Station, is currently operational, flows for which are provide in Table 172. Current and projected average and peak flows in the MIS, Ballona Creek Pump Station, and 36-inch force main are identical because the MIS is the only inlet into the pump station, and the force main is the pump station's only outlet.
- <sup>d</sup> The NCOS 2010 flows are projected to be substantially reduced by the operation of the NOS after its rehabilitation is completed by approximately 2006. In approximately 2004, however, another new outfall sewer, the East Central Interceptor Sewer (ECIS) is anticipated to come on-line, thereby reducing flows in the NCOS to 55 mgd and 88 mgd for average and peak flows, respectively, at that time. Under these conditions, the 2010 available capacity in the NCOS would be 66 mgd during peak months in 2004.

Source: Crehan, Michael, Engineer, Psomas. Letter to CDM, "Playa Vista Phase 2 Wastewater," February 18, 2003, included as Appendix N-2b of this EIR and subsequent e-mail communication.

the projected peak flow of 1.12 mgd from the Proposed Project would represent 6.4 percent of the force main's capacity, and thus would not cause the capacity to become constrained. The 36-inch force main discharges to the NCOS. As indicated in Table 172, the 2010 available capacity of the NCOS would be 54 mgd. As such, the 1.12 mgd of peak wastewater flows from the Proposed Project would represent 2.1 percent of the 2010 available peak month capacity, and therefore the projected flows would not cause the NCOS to become constrained. Consequently, the impact of wastewater generation to conveyance infrastructure from the Proposed Project would be less than significant, because the additional wastewater flows would not occur at a point where, and at a time when, a sewer's capacity is already constrained or would cause a sewer's capacity to become constrained.

HTS is anticipated to have sufficient capacity to treat projected average daily wastewater flows through 2010, without planned improvements, with a projected annual excess capacity of

14 mgd for daily average flows (i.e., 2010 projected average flows of 536 mgd would be accommodated with an excess of 14 mgd by the existing HTS treatment capacity of 550 mgd). The 0.47 mgd average wastewater generation estimated for the Proposed Project would use approximately 3.4 percent of the projected 14 mgd excess capacity. However, during peak months, even without the development of proposed uses, a deficit capacity of 20 mgd is currently projected to occur within the HTS by 2010 (i.e., 2010 projected peak flows of 570 mgd would exceed the existing HTS treatment capacity of 550 mgd by 20 mgd). As such, implementation of the Proposed Project would exacerbate the projected deficit capacity by adding another 1.12 mgd of peak wastewater generation.

As described in Subsection 2.2.3, Wastewater Treatment Facilities, the City of Los Angeles is currently developing an updated Wastewater Facilities Plan; the first, current phase of which is the IPWP. This plan assesses projected wastewater management needs for Los Angeles, identifies various means and operations available for meeting those needs, and develops a technical framework for development of policies and a facilities plan for meeting the needs through the 2020 planning horizon. In light of regional growth, and the associated wastewater generation, anticipated to occur by 2020, the IPWP identifies numerous means of, and options for, providing increased wastewater treatment capacity by 2020. Such options include, but are not limited to, planned expansions of existing treatment plants. If a 30 mgd expansion of the LAGWRP occurs, under any of the planned expansions, the treatment capacity deficit of 20 mgd, projected to occur by 2010, would be alleviated. Under such conditions, the Proposed Project's generation of additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. (i.e., would not be a significant impact). The Proposed Project is within the regional population projections for the Proposed Project area, as set forth in applicable long-range planning documents (i.e., the City of Los Angeles General Plan in this case). Proposed expansion is projected by 2020 and the Proposed Project is expected to be built before 2020. This impact would be considered to be potentially significant because the IPWP process is still underway and a specific strategy for addressing future wastewater treatment needs has not yet been determined and the planned expansions have not occurred. However, this potentially significant impact would be avoided by the existing City requirement that prior to issuance of building permits, adequate wastewater collection and treatment capacity must be demonstrated to be available to serve the Proposed Project, pursuant to the City's Sewer Allocation Ordinance. Because the Proposed Project could not connect to the local wastewater conveyance and treatment system without review and approval by LADPW, Proposed Project could not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As such, impacts to the local wastewater conveyance and treatment system would be less than significant.

In summary, construction activities would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As such, construction impacts to the local wastewater conveyance and treatment system would be less than significant. Operation of the Proposed Project would contribute an average of 0.47 mgd of wastewater to local conveyance, treatment, and disposal facilities, which would not constitute a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements; therefore, impacts would be less than significant. During peak months, the current available treatment capacity to serve the Proposed Project is projected to be exceeded by 20 mgd; however, the Proposed Project would not be allowed to contribute wastewater flows to the local wastewater collection and treatment system unless adequate collection and treatment capacity demonstrably exists to handle such flows, as required by the City's Sewer Allocation Ordinance (discussed above). The Proposed Project, therefore, could not substantially or incrementally exceed the future scheduled capacity of any one treatment plant (e.g., HTP) by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As such, the Proposed Project's additional wastewater flows would result in a less-than-significant impact, even during peak months, because Proposed Project-generated wastewater could not enter the HTS (i.e., exceed the existing capacity of a treatment plant).

### **3.5 Equivalency Program Impacts**

The preceding analysis addressed impacts associated with construction and operation of the Proposed Project relative to the adequacy of wastewater collection and treatment infrastructure. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

Wastewater impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased wastewater impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to wastewater collection infrastructure under the Equivalency Program would be similar to the Proposed Project, as Bureau of Sanitation oversight of design and planning of wastewater collection infrastructure under the Equivalency Program (i.e., to ensure system adequacy) would still occur. As such, construction impacts, as well as operational impacts related to wastewater



collection infrastructure would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since the total estimated wastewater generation at buildout would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Operational wastewater generation under the Equivalency Program would, under some development scenarios (i.e., variations in office, retail, and assisted living development patterns, while residential and community-serving would be unchanged), result in greater wastewater treatment capacity impacts than under the Proposed Project. As shown in Table 173 on page 1115, wastewater generation would increase for two of the three analyzed land use development scenarios under the Equivalency Program. The first scenario under the Equivalency Program (i.e., All Retail), in which no assisted living units would be developed and the reduced office uses would be transferred to retail development, would generate 0.446 mgd on an average day and 1.070 mgd on a maximum day, which represents a decrease of approximately 0.021 mgd and 0.050 mgd (4.5 percent decrease) for an average and maximum day, respectively, from Proposed Project generation. Under the second scenario (i.e., All Assisted Living), in which retail uses would be equal to those under the Proposed Project, yet in which the maximum number of assisted living units are constructed and office uses are reduced, wastewater generation would be increased over that which would occur under the Proposed Project. As Table 173 illustrates, the All Assisted Living scenario would result in the generation of 0.487 mgd on an average day and 1.168 mgd on a maximum day, which represents an increase of 0.020 mgd and 0.048 mgd (4.3 percent increase) over the Proposed Project, respectively. The analysis of the Equivalency Program also considered other equivalency scenarios, in which some proportion of assisted living units and retail development would be constructed while office uses would be minimized (as in the first scenario). Under these equivalency scenarios the amount of wastewater generation would vary depending on the amount of retail and assisted living units constructed. Based on an analysis of a number of different equivalency scenarios, the greatest wastewater generation would occur when the maximum number of assisted living units (i.e., 200 units) are constructed along with additional retail uses (i.e., 45,877 sq.ft.), due to the fact that assisted living units are more water-intensive than retail uses (i.e., they generate more wastewater associated with increased water use). As such, as illustrated in Table 173, the wastewater generation under the Retail/Assisted Living scenario of the Equivalency Program would be 0.470 mgd on an average day and 1.128 on a maximum day, which represents an increase of 0.003 mgd and 0.008 mgd (0.7 percent increase) over the Proposed Project.

Overall, based on the fact that, compared to the Proposed Project, the fluctuations in wastewater generation under all development scenarios of the Equivalency Program are equal to or less than 4.3 percent, the impacts relative to the Proposed Project are not substantial, and, further, all scenarios under the Equivalency Program would be subject to the limitations of the

Table 173

**AVERAGE AND PEAK WASTEWATER GENERATION – PROPOSED PROJECT AND  
EQUIVALENCY SCENARIOS**

Land Use	Generation Factor (gpd/unit)	Equivalency Scenario: All Retail		Equivalency Scenario: All Assisted Living		Equivalency Scenario: Retail/Assisted Living	
		Amount of Development	Generation	Amount of Development	Generation	Amount of Development	Generation
<b>Average Wastewater Generation (gpd)</b>							
Residential (d.u.)	160	2,600	416,000	2,600	416,000	2,600	416,000
Office (ksf)	203	50	10,150	150.90	30,633	50	10,150
Retail (ksf)	80	206.832	16,547	150	12,000	195.877	15,670
Community Serving (ksf)	80	40	3,200	40	3,200	40	3,200
Assisted Living (units/rooms)	125	0	0	200	25,000	200	25,000
<b>Total (mgd)</b>			<b>0.446</b>		<b>0.487</b>		<b>0.470</b>
Proposed Project			0.467		0.467		0.467
<b>Over/(Under) Proposed Project</b>			<b>(0.021)</b>		<b>0.020</b>		<b>0.0033</b>
<b>Maximum Day Wastewater Generation (gpd)</b>							
Residential (d.u.)	384	2,600	998,400	2,600	998,400	2,600	998,400
Office (ksf)	487	50	24,350	150.90	73,488	50	24,350
Retail (ksf)	192	206.832	39,712	150	28,800	195.877	37,608
Community Serving (ksf)	192	40	7,680	40	7,680	40	7,680
Assisted Living (units/rooms)	300	0	0	200	60,000	200	60,000
<b>Total (mgd)</b>			<b>1.070</b>		<b>1.168</b>		<b>1.128</b>
Proposed Project			1.120		1.120		1.120
<b>Over/(Under) Proposed Project</b>			<b>(0.050)</b>		<b>0.048</b>		<b>0.0080</b>

Notes: gpd = gallons per day mgd = million gallons per day ksf = thousand square feet d.u. = dwelling unit

Source: Camp, Dresser & McKee, Inc., 2003

City's Sewer Allocation Ordinance. Additionally, implementation of applicable Project Design Features (as discussed in Subsection 3.3, Project Design Features, in Section, IV.N.(1), the Water Consumption) and Project mitigation measures would minimize wastewater generation to the maximum extent practicable. As such, the total estimated wastewater generation at buildout, given adherence to the City's Sewer Allocation Ordinance, would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, and the Project's

additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Thus, impacts attributable to the Equivalency Program, as is the case with the Proposed Project, would be less than significant.

### **3.6 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within the Traffic Section of the EIR, Section IV.K.(1), require roadway widening at seven locations as well as other minor roadway enhancements that include restriping of roadways, and improvement of signalization and bus stop facilities. In addition, as discussed in the Water Consumption Section of the EIR, Section IV.N.(1), the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These off-site improvements are all located in developed urban areas. All of the off-site improvements, with the exception of the water regulator station, would occur within, or adjacent to, existing roadways. The water regulator station includes a small amount of above-ground piping equipment, a common element of the urban environment. Implementation of the Project's mitigation measures does not involve the construction of any buildings.

Off-site traffic improvements would not result in substantial wastewater generation during construction with the exception of dewatering discharges, if required, which would be discharged into the local storm drain system and not into local sewer collection and treatment systems. Operation of the proposed improvements would not generate any wastewater. As such, the construction and operation of the proposed improvements would not cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, and the improvements would not add additional wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. No impacts to wastewater collection and treatment systems are anticipated.

## **4.0 MITIGATION MEASURES**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of any building permit, construction of on-site infrastructure improvements necessary for the conveyance of project wastewater to the 42-inch

Marina Interceptor Sewer in Jefferson Boulevard shall be completed, or suitably guaranteed, to the satisfaction of the City Department of Public Works and other applicable responsible agencies.

## **5.0 UNAVOIDABLE ADVERSE IMPACTS**

Impacts to the local and regional sewer system would be less than significant, as the Proposed Project, Equivalency Program, and off-site improvements are not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. The Proposed Project, inclusive of the Equivalency Program, would create an incremental increase in wastewater generation in the City of Los Angeles. The incremental amount of average wastewater generated by the Proposed Project would not be substantial; however, during peak months, even without the development of the Proposed Project, a wastewater treatment deficit of approximately 20 mgd is expected to occur by 2010. The additional wastewater flows from the Proposed Project during peak months could potentially contribute to the exceedance of the future scheduled capacity of the HTP; however, as discussed above in Subsection 3.4, Project Impacts, the wastewater flows from the Proposed Project would not be allowed to enter the HTS unless adequate treatment capacity at HTP is demonstrated to LADPW, pursuant to the City's Sewer Allocation Ordinance. Given that the Proposed Project could not contribute to an exceedance of wastewater collection or treatment capacity, impacts would be less than significant. As pertains to the Project's off-site improvements, the construction and operation of the off-site improvements are not anticipated to generate or otherwise contribute wastewater flows to the HTS; hence no impacts would occur. Overall, with implementation of the mitigation measure presented above, as well as Project Design Features discussed in Section IV.N.(1), Water Consumption, no significant adverse impacts with respect to wastewater are anticipated to occur.

## **6.0 CUMULATIVE IMPACTS**

All the related projects are either within the City of Los Angeles or one of its contract agencies (i.e., non-City of Los Angeles jurisdictions that have contracts for discharge of their wastewater into the City of Los Angeles' system for conveyance and/or treatment and are under a contract with the Bureau of Sanitation for wastewater services); as such, it is assumed for the purposes of the cumulative analysis that all the related projects and the Proposed Project, inclusive of the Equivalency Program and off-site improvements, would be serviced by the HTS. As shown in Table 174 on page 1118, the daily average and peak month wastewater generation for the Proposed Project in conjunction with cumulative projects and other background growth

Table 174

CUMULATIVE WASTEWATER GENERATION

Land Use	Land Use					Wastewater Generation (mgd)				
	Proposed Project	Related Projects	Background Growth	Proposed + Related Projects + Background Growth	Generation Factor <sup>b</sup>	Units	Proposed Project	Related Projects	Background Growth	Proposed + Related Projects + Background Growth
Residential(d.u.)	2,600	9,552	3,038	15,190	160	gpd/d.u.	0.416	1.528	0.486	2.430
Office (s.f.)	175,000	14,409,396	1,458,440	16,042,836	0.15	gpd/s.f.	0.026	2.161	0.219	2.406
Retail (s.f.)	150,000	3,825,667	397,567	4,373,234	0.08	gpd/s.f.	0.012	0.306	0.032	0.350
Hotel (rooms)	0	4,307	431	4,738	0.13	gpd/room	0.000	0.001	0.000	0.001
Civic/Inst. (s.f.)	40,000	2,116,022	215,602	2,371,624	0.08	gpd/s.f.	0.003	0.169	0.017	0.190
Warehouse (s.f.)	0	357,868	35,787	393,655	0.02	gpd/s.f.	0.000	0.007	0.001	0.008
Restaurant (s.f.)	0	192,929	19,293	212,222	0.92	gpd/s.f.	0.000	0.177	0.018	0.195
Theater (seats)	0	3,391	339	3,730	4	gpd/seat	0.000	0.014	0.001	0.015
Industrial (s.f.)	0	15,572,657	1,557,266	17,129,923	0.08	gpd/s.f.	0.000	1.246	0.125	1.370
Parking (spaces)	0	2,695	270	2,965	0	gpd/space	0.000	0.000	0.000	0.000
<b>Total (Average)</b>							<b>0.457</b>	<b>5.610</b>	<b>0.898</b>	<b>6.965<sup>c</sup></b>
<b>Total (Peak)</b>										<b>16.717<sup>c</sup></b>

gpd = gallons per day gpm = gallons per minute mgd = million gallons per day d.u. = dwelling unit s.f. = square feet

Generation factors are from the City of Los Angeles Draft CEQA Thresholds Guide (1998), Wastewater. Peak month flow was calculated by multiplying average daily flows by the peaking factor of 2.4. Peaking factor provided by Psomas (Psomas, "Playa Vista Tract 49104 – Sewer Calculations and Report," December 12, 1995).

<sup>a</sup> Background growth adds 25 percent for residential development and 10 percent for non-residential development (all other uses) to consumption/generation totals to account for growth of related projects that are not subject to environmental review. In other words, residential consumption/generation rates are 25 percent higher and all other rates are 10 percent higher than would otherwise be quantified. See Appendix N-2a for detailed background growth calculations.

<sup>b</sup> Generation/consumption factors were derived assuming 23 ft<sup>2</sup> for each theater seat, 33 ft<sup>2</sup> for each restaurant seat, 850 ft<sup>2</sup> for each hotel room, 212 ft<sup>2</sup> for each school student, and 154 ft<sup>2</sup> for each parking space. See Appendix N-4 for detailed factor derivations.

<sup>c</sup> Under the Project's Equivalency Program, land uses would generate a maximum additional average and peak wastewater flow of 0.020 mgd and 0.048 mgd, respectively, which represents an increase in cumulative wastewater generation of 0.3 percent over the total flow of 6.965 mgd (average) and 16.717 mgd (peak).

Source: Camp Dresser & McKee Inc. 2003

would be 6.97 mgd and 16.72 mgd, respectively, all of which would be treated at HTP.<sup>512</sup> The Project's Equivalency Program would generate a maximum additional average and peak wastewater flow of 0.020 mgd and 0.048 mgd, respectively, which represents an increase in cumulative wastewater generation of 0.3 percent.

Cumulative impacts to the local and regional sewer system from implementation of the Proposed Project (inclusive of the Equivalency Program and off-site improvements), related projects, and other background growth would be less than significant, as the Proposed Project and related growth is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. As discussed previously, the HTS is anticipated to have sufficient capacity to treat projected wastewater flows from the Proposed Project, related projects, and other background growth through 2010, with the exception of peak months, with a projected annual average excess capacity of 14 mgd. The additional wastewater flows from the Proposed Project, related projects, and other background growth during peak months would incrementally exceed the future scheduled capacity of the HTP by generating flows greater than those anticipated in the City's Wastewater Facilities Plan. In addition to the fact that wastewater generated by the operation of the Proposed Project could result in a potentially significant impact, the projected additional deficit anticipated by local and regional jurisdictions for wastewater treatment capacity indicates that there could be a significant cumulative impact. Regardless of whether the Proposed Project is developed, the HTS will experience a projected capacity deficit of approximately 20 mgd during peak flow months. The City of Los Angeles is currently evaluating various means and options for providing additional treatment capacity to meet future needs. The provision of additional treatment capacity in the future would eliminate the potentially significant impact for both Project-related and cumulative wastewater generation. In the meantime, adherence to the City's Sewer Allocation Ordinance would limit the amount of cumulative development that could proceed within the City of Los Angeles prior to such additional treatment capacity being secured. As pertains to those related projects located in jurisdictions other than the City of Los Angeles (which are not necessarily subject to the Sewer Allocation Ordinance), inasmuch as those respective jurisdictions are under service contracts with the Bureau of Sanitation for conveyance and/or treatment of wastewater, it is assumed that the Bureau of Sanitation would consider such flows from these jurisdictions when evaluating the availability of treatment capacity for projects located within the City of Los Angeles. It is anticipated that all contributions to the HTS from the City of Los Angeles and other "member" jurisdictions would be quantified or otherwise included as part of the Bureau of Sanitation's assessment of the availability of sewer and treatment capacity for projects subject to the Sewer Allocation Ordinance. As such, no significant cumulative impacts are expected to occur from implementation of the Proposed Project, Equivalency Program, and off-site improvements.

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<sup>512</sup> *Peak-month cumulative wastewater generation was calculated by applying a peaking factor of 2.4 to the average daily cumulative wastewater generation, as discussed above in Subsection 3.1, Methodology.*

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**N. UTILITIES**  
**(3) SOLID WASTE**

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**1.0 INTRODUCTION**

This section addresses potential impacts of the Proposed Project on solid waste facilities, service systems, and regulations. This section describes the City and County solid waste collection services and disposal facilities that serve the Proposed Project site, as well as the regulatory measures intended to minimize the volume of solid waste requiring landfill disposal, such as relevant State legislation and City/County recycling programs. This section also estimates the amount of solid waste generated daily by the Proposed Project at buildout, and evaluates the impacts of solid waste generation by the Proposed Project on existing solid waste collection and disposal capabilities that serve the City. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures..

For information and impact analysis regarding the generation and disposal of potential hazardous waste and contaminated soil, see Section IV.I, Safety/Risk of Upset in this EIR.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Regulatory Framework**

**2.1.1 State Level**

The California Integrated Waste Management Act of 1989 (Assembly Bill 939 – “AB 939”) established the California Integrated Waste Management Board (CIWMB) and requires the implementation of aggressive solid waste management programs. This legislation required each city or county to direct 25 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 1995. By the year 2000, 50 percent of the waste stream was to be diverted. AB 939, as amended, requires every county and city in the State to prepare a Source Reduction and Recycling Element (SRRE) which identifies programs that the county or city will implement to achieve a solid waste disposal reduction goal of 50 percent by the year 2000, or as soon as possible thereafter (the City achieved a diversion rate of 58.8 percent in 2000). AB 939 also requires each city and county to prepare a Household Hazardous Waste

Element (HHWE) and Nondisposal Facility Element (NDFE), and each county to prepare a Countywide Siting Element and Summary Plan. The aggregate of all the SRREs, HHWEs, NDFEs, the Siting Element, and Summary Plan constitutes a Countywide Integrated Waste Management Plan (CoIWMP).

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each “development project” to provide an adequate storage area for collection and removal of recyclable materials.

State Assembly Bill 2020, also known as “The Bottle Bill,” assists in the diversion of solid waste from landfills by requiring redemption centers for beverage containers.

### **2.1.2 County Level**

The Los Angeles County Solid Waste Management Action Plan (Action Plan), adopted by the County Board of Supervisors in April 1988, and by the County Sanitation Districts of Los Angeles Board of Directors as well as the City of Los Angeles Board of Public Works in May 1988, is a comprehensive solid waste management study and implementation program. The Action Plan is an integrated regional approach to managing solid waste, incorporating source reduction, recycling, and composting programs along with public education awareness programs. The Action Plan recognizes that landfills will remain an integral part of the County’s solid waste management system for the foreseeable future, providing for 15 years of disposal capacity on a countywide basis. The Action Plan reaffirms the policy of managing solid waste in Los Angeles County through a reasonable balance of public and private operations and facilities, including a regional public/private landfill system. This policy, combined with sufficient daily disposal capacity, relies on competitive market forces rather than government action to regulate waste flow.

The County SRRE identifies the programs and policies that the County will implement in order to achieve the solid waste disposal reduction goal of 50 percent by the year 2000 or as soon as possible thereafter. These policies and programs include the Countywide Yard Waste Management Program, the Countywide Christmas Tree Recycling program, and revisions in procurement policies for County departments to encourage the purchase of materials with recycled content.

Through the Countywide Siting Element (CSE) of the CoIWMP, which was finalized in June of 1997, the countywide need for fifteen years of disposal capacity was addressed. The CSE’s major recommendations include opening new landfills at Elsmere Canyon and Blind Canyon, although Elsmere Canyon has since been removed from consideration. The CoIWMP,



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approved by the CIWMB on June 23, 1999, superceded the County Solid Waste Management Plan as the framework for solid waste planning.

### **2.1.3 Local Level**

The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) is the long-range solid waste management policy plan for the City, while the Source Reduction and Recycling Element (SRRE) is the strategic action policy plan for diverting solid waste from landfills. The objective of the CiSWMPP is to reduce at the source or recycle a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter. The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. The CiSWMPP establishes citywide diversion objectives of 25 percent by 1995, 50 percent by 2000, and 70percent by 2020. The CiSWMPP provides direction for the solid waste management hierarchy and integrates into all facets of solid waste management planning. It ensures that disposal practices do not conflict with diversion goals. It also serves as an umbrella document for the City's SRRE as well as other citywide solid waste management planning activities.

The following five goals of the CiSWMPP reflect the importance of source and materials recovery to the success of the plan and, therefore, the intent of the city to follow the integrated waste management hierarchy that forms the basis of AB 939:

- **Maximum Waste Diversion:** The goal is to create an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the waste requiring disposal.
- **Adequate Recycling Facility Development:** To expand the siting of facilities that enhance waste reduction, recycling, and composting throughout the City beyond the current limits of the zoning code in ways that are economically, socially, and politically acceptable.
- **Adequate Collection, Transfer, and Disposal of Mixed Solid Waste:** The City shall ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed in a manner that minimizes adverse environmental impacts.
- **To develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.**

- The City shall operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.

The City's SRRE serves as a guidance document and strategic action plan for diverting solid waste from landfills. The source reduction, recycling, composting, special waste, and public education goals are defined by specific programmatic elements including tasks, roles, responsibilities, and an implementation schedule. The SRRE provides a 10-year programmatic plan for solid waste diversion objectives between 1990 and 2000, in accordance with the requirement of AB 939. It has been updated annually and is based on an ongoing evaluation of programs and waste analysis. The plan establishes diversion objectives for specific programs and targeted generators that, in combination, could enable the City to exceed the 1995 and 2000 diversion objectives of the CiSWMPP. It also presents an analysis of the projected 15 year disposal capacity requirements for the City of Los Angeles based on achieving the 1995 and 2000 diversion objectives of the SRRE and, with continual increased diversion, the CiSWMPP long-term diversion objectives. Guidance for, and implementation of, the solid waste diversion programs identified in the SRRE are administered by the City of Los Angeles Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division (SRCRD).

The General Plan Framework Element (Element) is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The Element responds to State and Federal mandates to plan for the future. In planning for the future, the City of Los Angeles is using population forecasts provided by the Southern California Association of Governments (SCAG). The Element addresses many programs the City has implemented to divert waste from disposal facilities. These include source reduction programs such as home composting, recycling programs such as Curbside Recycling Program, and composting programs that produce the City's TopGro soil amendment. The Element suggests that for these programs to succeed, the City should site businesses at appropriate locations within its borders that handle, process, and/or manufacture recyclable commodities to allow a full circle recycling system to develop. It also discusses how Recycling Market Development Zones and other Development zone areas should be utilized to bring these beneficial businesses into Los Angeles, and suggests that development and support of recyclable materials markets is one of the City's challenges in the years ahead. The Element addresses means for dealing with the solid waste remaining after diversion, for which the City will have a continuing need for solid waste transfer and disposal facilities. It states that the capacity of the landfills located in Los Angeles is very limited, and that more transfer facilities will be needed to transfer waste from the collection vehicles and transport it to other, more remote landfill facilities. The Element acknowledges that capacity must be provided for the waste collected by both City agencies and private collection companies. To that, the City identified several landfill disposal facilities that may be accessed by truck and others that would require the City to ship its solid waste by train.

The City of Los Angeles Bureau of Sanitation established, and presently operates, its Curbside Recycling Program, which was designed to promote source reduction to achieve the goals established by AB 939 and associated City programs (e.g., the SRRE). The Curbside Recycling Program collects commingled recyclables and green waste for all single-family and a limited number of multi-family complexes in the City. Furthermore, the Bureau of Sanitation has also implemented curbside yard trimmings, backyard composting/grasscycling, drop-off yard trimmings, horse manure diversion, biosolids diversion, and bulky item recycling programs. As further described below, the Bureau also operates a Mobile Household Hazardous Waste collection center that rotates among 24 locations throughout the City, collecting various types of household hazardous waste, including used motor oil.

The SRRE, as discussed above in Subsection 2.1.1, must contain a Household Hazardous Waste Element (HHWE). The Bureau of Sanitation is responsible for the operation of the City's household hazardous waste (HHW) program, which is the program that implements the HHWE. The Bureau began the HHW collection program in 1988, with one-day "round-up" events conducted about 10 times per year. This program was replaced with the Mobile Collection Program in 1996, to serve more residents and more locations each calendar year. Additional programs have been added over time, and the following are the major programs operated by the Bureau in the year 2000:<sup>513</sup>

- Mobile HHW collection events.
- Education and public information.
- Conditionally Exempt Small Quantity Generator (CESQG) collection.
- Recycling programs for latex paint, used motor oil, and automobile batteries.
- Electronic waste (not designated hazardous in 2000) and mercury thermometer replacement.

Additionally, as discussed above in Subsection 2.1.1, the SRRE must contain a Nondisposal Facility Element (NDFE), as required by the California Public Resources Code (PRC) Section 41730. Every city and county must prepare and adopt a NDFE that identifies all existing, expanded, or proposed new nondisposal facilities, which will be needed to implement local SRREs. The NDFE for the City has been prepared and adopted in compliance with State law and in accordance with guidelines and format established by the CIWMB. Pursuant to the PRC, Section 40151, a nondisposal facility is defined as any solid waste facility that is required

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<sup>513</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division. AB 939 2000 Report. August 2001.*

to obtain a State Solid Waste Facility Permit, except a disposal facility or a transformation facility.<sup>514</sup>

## 2.2 Existing Conditions

### 2.2.1 Solid Waste Generation and Collection

Within the City of Los Angeles, the City Bureau of Sanitation collects approximately 35 percent of the waste generated by single-family residences, a limited number of multi-family dwellings, and City facilities.<sup>515</sup> A number of private companies collect the remaining 65 percent. In 2000, approximately 3.75 million tons of solid waste were disposed by the Bureau of Sanitation and private haulers with a recycling rate of approximately 58.8 percent, resulting in a total of 5.36 million tons being diverted from landfills.<sup>516</sup> In addition to roughly 10,700 tons per day (tpd) of municipal solid waste (i.e., non-hazardous solid waste that can be disposed of at a Class III landfill), in 2000 the City generated approximately 1,100 tpd of construction and demolition waste that was disposed of at inert landfills.<sup>517</sup>

With respect to the Proposed Project site, most of the site is vacant land, and only a minor amount of solid waste is currently being generated by existing land uses. There are two buildings on the Proposed Project site, Building 22 and Building 45, which remain from the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant. Building 22 is a 5,500+ square-foot warehouse used for storage, and as such generates minimal quantities of solid waste. Building 45 consists of approximately 43,500 square feet and is used intermittently for filming and other activities; hence, it also generates minimal quantities of solid waste. Other small buildings, such as sheds, minor storage structures, and construction trailers associated with development of the adjacent Playa Vista First Phase Project also exist in the former Salvage Yard area of the Proposed Project site. These buildings, however, are mainly used for equipment and material storage, and accordingly, they generate only nominal quantities of solid waste.

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<sup>514</sup> Los Angeles County Department of Public Works Waste Management Division. "Los Angeles County Nondisposal Facility Element." March 1994.

<sup>515</sup> Coca, Karen, Environmental Supervisor, City of Los Angeles, Department of Public Works, Bureau of Sanitation. Personal Communication. February 5, 2002.

<sup>516</sup> City of Los Angeles, Department of Public Works, Bureau of Sanitation, Solid Resources and Recycling Division. AB 939 2000 Report. August 2001.

<sup>517</sup> Coca, Karen, Environmental Supervisor, City of Los Angeles Bureau of Sanitation. Personal Communication. February 5, 2002.

### 2.2.2 Solid Waste Disposal

The locations of the landfills in Los Angeles County are illustrated in Figure 96 on page 1127. There are three types of disposal facilities within the County; (1) Class III Landfills (Municipal Solid Waste Landfills); (2) Unclassified (Inert) Landfills; and (3) Transformation (waste to energy) Facilities. A Class III Landfill is a facility for non-hazardous solid waste (e.g., household waste), wherein site characteristics and containment structures isolate non-hazardous solid waste from the Waters of the State (i.e., impervious liner/barrier and leachate control system protects underlying groundwater). Unclassified (Inert) Landfills are defined as facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition debris. Transformation Facilities involve the incineration, pyrolysis, destructive distillation, gasification or the chemical or biological processing of municipal solid waste in order to generate energy, reduce volume or produce synthetic fuel. The major Class III landfills in Los Angeles County and their status are listed in Table 175 on page 1128. Of the County landfills listed in Table 175, the only facilities that currently accept waste from the City of Los Angeles (those that would serve the Proposed Project site) are Bradley, Calabasas, Chiquita Canyon, and Sunshine Canyon Landfills.

Of the approximately 13.1 million tons of solid waste disposed by jurisdictions in the County in 1999 (the most recent year for which complete County-wide data exists) at disposal facilities in and out of the County, about 11.9 million tons (90.8 percent) were disposed at Class III landfills. About 510,000 tons (3.9 percent) were disposed of at in-County waste-to-energy facilities (Commerce and Southeast Facilities), and 566,000 tons (4.3 percent) were disposed at in-County permitted unclassified landfills (inert waste only).<sup>518</sup> Regarding City-generated solid waste disposal, as of mid-2001, the four landfills that serve the City of Los Angeles (identified above) have a combined remaining capacity of approximately 41.2 million tons. Based on the average disposal rate of 15,100 tons per day at these facilities (as of October 2002), which amounts to approximately 4.7 million tons per year (assuming landfill operations six days per week), the current remaining capacity at these four landfills may be fully consumed by late 2010. This capacity estimate does not include the anticipated landfill expansions that are currently being pursued (see notes in Table 175 on page 1128 and discussion below).

As of January 2003, Sunshine Canyon Landfill has received planning approval to operate a new 55-million-ton capacity expansion within the City of Los Angeles. Although the City has granted planning approval (i.e., use permit from the City Planning Department), a permit to operate the solid waste disposal facility is currently in process with the CIWMB Local Enforcement Agency, with permitting and start of operations in the expansion area anticipated to

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<sup>518</sup> *Sanitation Districts of Los Angeles County. Continued Operation of the Puente Hills Landfill Draft EIR. June 2001.*

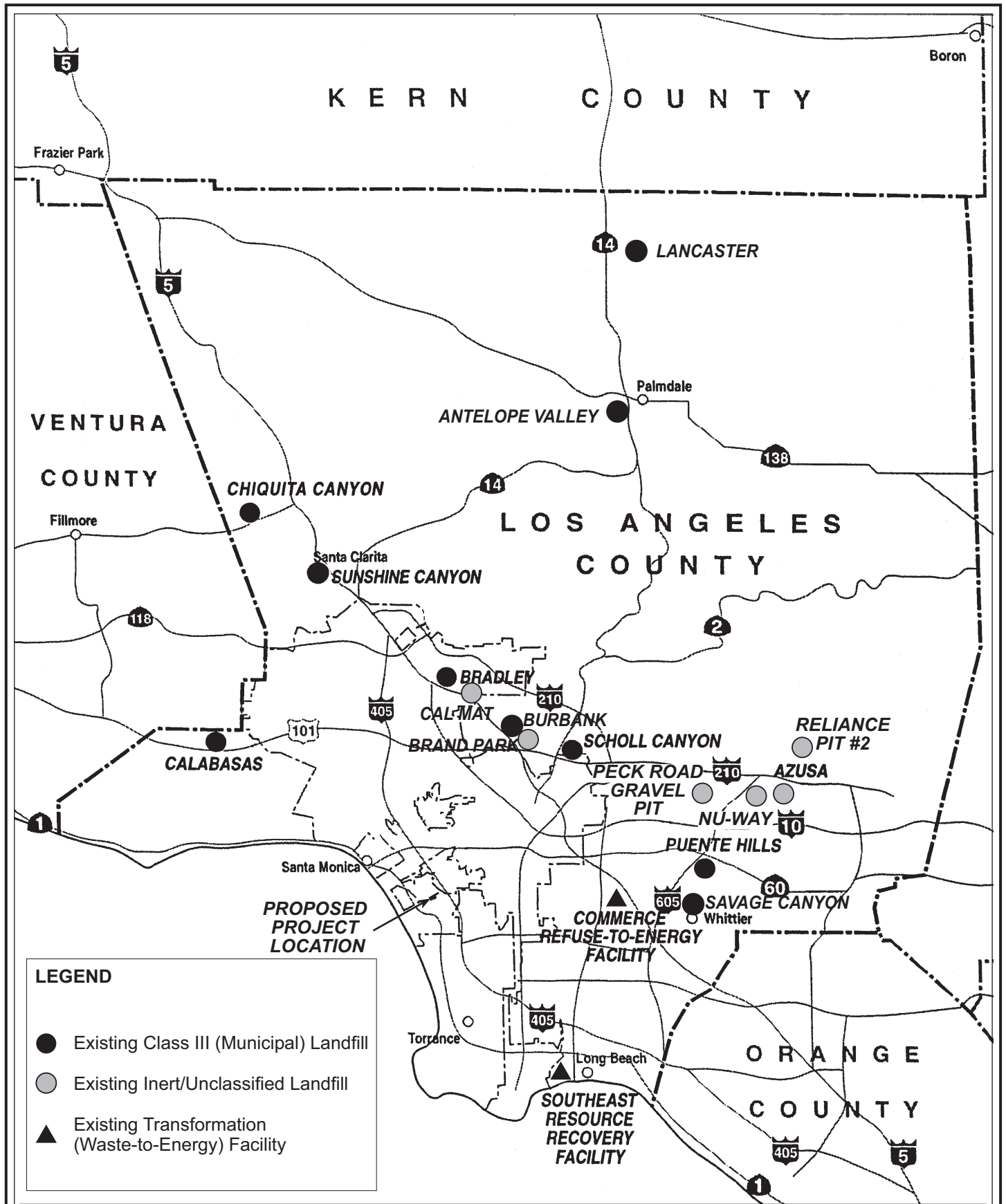


Figure 96  
**Locations of Existing  
 Waste Disposal Facilities**



NOT TO SCALE  
 Source: CDM, 2002

Table 175

## REGIONAL CLASS III MUNICIPAL SOLID WASTE LANDFILLS

Site	Owner/Operator	Actual Flow (tpd) <sup>a</sup>	Permitted Daily Capacity (tpd) <sup>l</sup>	Approximate Closure Date <sup>m</sup>
Savage Canyon Landfill <sup>b</sup>	City of Whittier	280	350	2046
Burbank Landfill (Site #3) <sup>c</sup>	City of Burbank	175	240	2050
Bradley Landfill West and West Extension <sup>d</sup>	Waste Management, Inc.	2,200	10,000	2006
Puente Hills Landfill #6 <sup>e</sup>	Sanitation Districts of Los Angeles County	13,200	12,000	Late 2005
Calabasas Sanitary Landfill <sup>f</sup>	Sanitation Districts of Los Angeles County	1,100	3,500	2018
Scholl Canyon Sanitary Landfill <sup>g</sup>	Sanitation Districts of Los Angeles County	1,200	3,400	2023
Antelope Valley Public Landfill I (Palmdale) <sup>h</sup>	Arklin Brothers Enterprises, USA Waste	2,000	1,400	2011
Lancaster Landfill and Recycling Center <sup>i</sup>	Waste Management of California, Inc.	1,400	1,700	2032
Chiquita Canyon Sanitary Landfill <sup>j</sup>	Republic Services of California, Inc.	5,300	6,000	2011
Sunshine Canyon Sanitary Landfill <sup>k</sup>	Browning-Ferris Industries, Inc.	6,500	11,500	2006

<sup>a</sup> tons per day

<sup>b</sup> Savage Canyon Landfill only accepts Municipal Solid Waste (MSW), or Class III solid waste, and accepts materials only from cities under contract, and not from the City of Los Angeles. Source: Gina Nila, Public Works Manager, City of Whittier, Personal Communication, January 31, 2002.

<sup>c</sup> Burbank Landfill Site #3 averages more than 175 tpd, but this excess amount is green/yard waste that is diverted for composting. The facility only accepts Class III MSW, and only from the City of Burbank. Source: Jerry Shay, Landfill Supervisor, City of Burbank, Personal Communication, February 1, 2002.

<sup>d</sup> Bradley Landfill accepts Class III MSW, inert waste, and wood/yard waste (for diversion), and receives approximately 50 percent of its waste stream from the City of Los Angeles. Source: Bruce Matlock, Health & Safety Compliance Supervisor, Waste Management, Inc. -- Bradley Landfill, Personal Communication, October 16, 2002.

<sup>e</sup> Puente Hills Landfill accepts only Class III MSW, and receives a weekday average of 13,200 tpd, with approximately 6,000 tpd on Saturdays: average weekly tonnage is equal to permitted capacity of 72,000 tons per week. Currently the remaining capacity would force closure of the facility by late 2005; however, an EIR is being prepared as a permit condition for expansion of the landfill to extend the service life to 2015. As of October 2002, the permit is still in process. This facility does not accept waste from the City of Los Angeles. Source: Larry Mendoza, Landfill Manager, Sanitation Districts of Los Angeles County, Personal Communication, October 16, 2002.

<sup>f</sup> Calabasas Sanitary Landfill (SLF) accepts only Class III MSW, approximately 40 percent of which is from the City of Los Angeles. Source: Larry Mendoza, Landfill Manager, Sanitation Districts of Los Angeles County, Personal Communication, January 31, 2002.

<sup>g</sup> Scholl Canyon SLF accepts only Class III MSW, but none from the City of Los Angeles. Source: Larry Mendoza, Landfill Manager, Sanitation Districts of Los Angeles County, Personal Communication, January 31, 2002

<sup>h</sup> Antelope Valley Landfill accepts only Class III MSW, but only processes transfers of solid waste generated within the City of Los Angeles (i.e., no disposal of waste generated within the City of Los Angeles). As a result, the facility only disposes of approximately 600 tpd, as opposed to the 2,000 tpd it receives. The additional 1,400 tpd the facility receives is mostly soil used for beneficial uses, particularly as cover soil for disposed waste at the landfill. Other portions of the additional material consist of concrete and wood that are recycled. Currently, the landfill has capacity and is permitted to operate until 2011; however, an expansion anticipated to be permitted by the end of 2002 will extend that service life to 2037. As of October 2002, the permit is still in process. Source: Mike Williams, District Landfill Manager, Waste Management of California, Inc., Personal Communication, October 16, 2002.

<sup>i</sup> Lancaster Landfill accepts only Class III MSW, but only processes transfers of solid waste from the City of Los Angeles (i.e., no disposal of waste generated within the City of Los Angeles). The actual tonnage disposed at the facility is about 1,200 tpd, as opposed to the 1,400 tpd it receives. The additional 200 tpd of material handled at the facility consists mostly of soil for beneficial uses (i.e., cover soil for disposed wastes), as well as green wastes and concrete/building materials, which are recycled. Source: Mike Williams, District Landfill Manager, Waste Management of California, Inc., Personal Communication, October 16, 2002.

<sup>j</sup> Chiquita Canyon SLF accepts Class III MSW and inert waste, approximately 82 percent of which originates within the City of Los Angeles. Source: Matt Terrell, Landfill Manager, Chiquita Canyon Sanitary Landfill, Personal Communication, February 4, 2002.

<sup>k</sup> Sunshine Canyon SLF accepts only Class III MSW, including waste generated within the City of Los Angeles. In early 2002, the facility received planning approval to operate an extension within the City of Los Angeles. Though not currently operational, the expansion into the City jurisdiction would extend the service life of the entire facility (County and City portions of the landfill) to 2028. In November 2002, the City of Los Angeles submitted a Solid Waste Facility Permit Application to the City of Los Angeles Solid Waste Local Enforcement Agency (LEA), which enforces applicable rules and regulations for the California Integrated Waste Management Board (CIWMB) within the City; because the application was received before the end of 2002 (as anticipated), the City portion of the facility is expected to be operational by the end of 2003. Source: Dave Thompson, Environmental Specialist, City of Los Angeles, Environmental Affairs Department, Personal Communication, February 1, 2002, updated January 7, 2003 and July 8, 2003.

<sup>l</sup> Permitted daily capacity is determined by the CIWMB Local Enforcement Agency for the jurisdiction in which the facility is located, based on the project waste stream for the area served by the facility, the size of the facility, and any environmental constraints to full utilization.

<sup>m</sup> The landfill closure dates listed here are based on existing disposal rates at respective facilities and total permitted capacity. Closure dates would change if permits for additional capacity or facility expansion are received.

Source: Camp, Dresser & McKee, Inc., 2003

occur by July 2003. If this extension is implemented, the City's solid waste disposal capacity (inclusive of all four landfills) would increase by 55 million tons, thereby extending the collective service life of the four facilities to 2022.

There are six unclassified (inert) landfills that have restrictions regarding origins of waste. The inert landfills are:

- Azusa Land Reclamation
- NU-Way Live Oak Landfill
- Peck Road Gravel Pit
- Reliance Pit #2
- Brand Park Landfill
- Calmat Class III Disposal Site

According to the Los Angeles County Countywide Siting Element, as of December 31, 1995, the total remaining permitted inert waste capacity in Los Angeles County was estimated to be approximately 53.1 million tons.<sup>519</sup> Based on the average 1999 disposal rate of 566,000 tons per year, this capacity would be exhausted in approximately 94 years (i.e., 2090). According to the Los Angeles County Department of Public Works, Environmental Programs Division, because the inert waste landfills within the County have ample capacity for many decades, inert landfill capacity data is not updated regularly as is Class III Municipal Solid Waste disposal capacity data. As such, the inert waste capacity data contained in the latest Countywide Siting Element reflects the best available inert capacity data.<sup>520</sup> Therefore, there is anticipated to be no shortfall in disposal capacity for inert waste within the County.

### **2.2.3 Solid Waste Diversion**

As described above in Subsection 2.1.3, Local Level, the City's SRRE provides the strategic action policy and associated programs for diverting solid waste from landfills, as outlined in the CiSWMPP and addressed in the Framework Element. Accordingly, the SRCRD has undertaken numerous programs designed to reduce the amount of waste requiring disposal

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<sup>519</sup> *County of Los Angeles, Department of Public Works, Environmental Programs Division. Los Angeles County Countywide Siting Element. June 1997.*

<sup>520</sup> *Barker, Bob, Senior Civil Engineer, Los Angeles County Department of Public Works. Personal Communication. June 23, 2003.*



through source reduction, re-use and recycling. SRCRD has focused on education and public information and reducing the amount of waste generated or collected by City departments which control 39.5 percent of the total wastestream generated in the City. City department programs include education, market development, recycling, source reduction, legislation, purchase of materials with recycled content, and composting.<sup>521</sup> As also described above, the City Bureau of Sanitation presently operates the Curbside Recycling Program and a Mobile Household Hazardous Waste collection center. As of April 1998, the diversion rate away from conventional landfill disposal for this Curbside Recycling Program was over 43 percent. In 2000, the Mobile Household Hazardous Waste Collection Program processed about 2.4 million pounds (about 1,200 tons) of household hazardous waste, as well as 1.4 million gallons of used motor oil.<sup>522</sup>

The SRCRD has identified several types of waste generators as being well-suited for substantial reduction in waste generation through source reduction, re-use and recycling. These “targeted generators” include multi-family residences, major motion picture studios, large office buildings, hotels and motels, and various retail categories. The SRCRD works with targeted generators to achieve the diversion goals mandated by AB 939 and reflected in the CiSWMPP.

The implementation of the above-described recycling and diversion programs has resulted in a decrease in solid waste requiring disposal from 3,781,893 tons in 1990, with a diversion rate of 20.6 percent, to 3,753,412 tons in 2000, with a diversion rate of 58.8 percent.<sup>523</sup> As discussed above, the City has set a goal of 70 percent diversion for the year 2020.

The adjacent Playa Vista First Phase Project has implemented a recycling program for construction and demolition waste, with an overall diversion rate of 92 percent as part of the City-approved Playa Vista Construction Materials Recycling Plan.<sup>524</sup> Furthermore, the adjacent Playa Vista First Phase Project has incorporated an on-site recycling program for residential and commercial waste streams, coordinated with Crown Disposal/Community Recycling (a private company), which is the current vendor for collecting, recycling, and disposing trash generated at Playa Vista and would serve the Proposed Project (see Appendix N-3a of this EIR). Crown Disposal/Community Recycling offers an integrated recycling program which includes source-separated (on-site) recycling programs for businesses and multi-family dwellings, as well as mixed solid waste processing at its Sun Valley processing facilities for all waste generated to

<sup>521</sup> *Ingalls, Kelly, City of Los Angeles, Solid Resources Citywide Recycling Division. Personal Communication. April 22, 1999.*

<sup>522</sup> *Coca, Karen, Environmental Supervisor, City of Los Angeles Bureau of Sanitation. Personal Communication. February 5, 2002.*

<sup>523</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Solid Resources Citywide Recycling Division. AB 939 2000 Report. August 2001.*

<sup>524</sup> *Playa Capital Company. “Playa Vista’s 92 percent Recycling Rate.” July 2002.*

further collect recyclables.<sup>525</sup> It is anticipated that the Proposed Project would achieve a similar construction waste diversion rate through implementation of similar programs.

A new regional Materials Recycling Facility (MRF) is currently being designed to be built on a site near the City of Industry by the Sanitation Districts of Los Angeles County that will target mixed commercial and retail waste streams, and that will have a processing capacity of 4,000 tons per day. This facility, which is currently permitted to operate, and in construction, is anticipated to be operational by mid to late 2004. This facility, and other MRF's in the region, can minimize the amount of solid waste sent to landfills by diverting waste materials for reuse.<sup>526</sup>

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

Construction-related inert waste generation was estimated for the Proposed Project using factors from the City of Santa Monica Green Building Program, Solid Waste Division's construction waste generation rates (see Appendix N-3b to this EIR)<sup>527</sup>, which are categorized by development type (i.e., multi-unit residential, low-rise commercial, low-rise institutional, low-rise residential), and are summarized in Table 176 on page 1132. Class III operations-related solid waste generation was estimated for the Proposed Project using factors from the California Integrated Waste Management Board's Waste Characterization Database,<sup>528</sup> summarized in Table 177 on page 1132. The resultant impact of the solid waste generation on available landfill disposal capacity was evaluated relative to landfills that currently accept waste from the City of Los Angeles.

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<sup>525</sup> Dmitriew, Alex, Crown Disposal, Inc. *Personal Communication*. Will-serve letter re: "Village at Playa Vista." July 25, 2003.

<sup>526</sup> Chan, Grace, Los Angeles County Sanitation Districts. *Telephone Communication*. March 30, 2001.

<sup>527</sup> City of Santa Monica Green Building Program, Solid Waste Division. "Construction Projects – Typical Waste Generation Rates." Table on Web site (<http://greenbuildings.santa-monica.org/appendices/apawastegeneration.html>). Accessed January 29, 2003.

<sup>528</sup> California Integrated Waste Management Board. *Waste Characterization Database* (<http://www.ciwmb.ca.gov/WasteChar/WasteGenRates>). November 2001.

Table 176

## CONSTRUCTION-RELATED INERT WASTE GENERATION FACTORS

	Wood	Drywall	Metal	Concrete	Corrugated Asphalt	Other Waste
Residential <sup>a</sup>	0.320 tons/d.u.	0.736 tons/d.u.	0.072 tons/d.u.	1.432 tons/d.u.	0.000 tons/d.u.	1.232 tons/d.u.
Office <sup>b</sup>	0.680 tons/ksf	0.050 tons/ksf	0.000 tons/ksf	0.000 tons/ksf	0.140 tons/ksf	0.270 tons/ksf
Retail <sup>b</sup>	0.680 tons/ksf	0.050 tons/ksf	0.000 tons/ksf	0.000 tons/ksf	0.140 tons/ksf	0.270 tons/ksf
Civic/Community <sup>c</sup>	0.860 tons/ksf	0.220 tons/ksf	0.210 tons/ksf	0.990 tons/ksf	0.000 tons/ksf	0.540 tons/ksf

*d.u.* = dwelling unit

*ksf* = thousand square feet

<sup>a</sup> Residential calculations assume 800 square feet per dwelling unit on average. As such, original Residential Multi-Unit Construction factors multiplied by 0.8 (original residential factor based on tons per 1,000 sq.ft.).

<sup>b</sup> Office and Retail uses were evaluated using the Commercial Low-Rise Construction factor.

<sup>c</sup> Community-serving uses were evaluated using the Institutional Low-Rise Construction factor.

Source: City of Santa Monica Green Building Program, Solid Waste Division. "Construction Projects – Typical Waste Generation Rates." Table on website: <http://greenbuildings.santa-monica.org/appendices/apawastegeneration.html>.

Table 177

## CLASS III SOLID WASTE GENERATION FACTORS

Land Use	Average Generation Factor <sup>a</sup>
Residential	0.00612 tpd/du
Office	0.003 tpd/ksf
Retail	0.0156 tpd/ksf
Civic/Community	0.0035 tpd/ksf

*tpd* = tons per day      *du* = dwelling units      *ksf* = thousand-square feet

<sup>a</sup> Factors for solid waste generation are from California Integrated Waste Management Board website: [www.ciwmb.ca.gov/WasteChar/WasteGenRates.htm](http://www.ciwmb.ca.gov/WasteChar/WasteGenRates.htm)

## 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p. K.3-2) states that the determination of the significance of solid waste impacts shall be made on a case-by-case basis considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical generation rates;

- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Based on these factors the Proposed Project would have a significant impact if:

- The Project creates a need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste.
- The Project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

### 3.3 Project Design Features

#### 3.3.1 Source Separation

The Proposed Project would facilitate solid waste separation at the source through requirements for recycling bins for paper, landscaping waste materials, and a bin for commingled glass, plastic, and metal to be located within each building. Such a requirement may be applied through title or leasehold covenants and administered through homeowners' or property owners' associations.

Surveys of recycling programs in a number of existing communities indicate that community-wide participation in mandatory programs with weekly collections range from 40-98 percent, averaging 73 percent, whereas strictly voluntary programs may average 46 percent participation.<sup>529</sup> The Proposed Project development is likely to achieve a greater than average participation rate because measures to facilitate recycling would be incorporated into the design, but for the purpose of this analysis, the average participation rate was used. With an average participation rate of 73 percent, overall reduction of an estimated 49.3 percent is achievable. It should be noted that the diversion requirements of AB 939, as discussed above in Subsection 2.1, Regulatory Framework, apply only to cities and counties. As such, the Proposed Project's anticipated on-site diversion programs would serve to enhance the ability of the City of

<sup>529</sup> *Los Angeles Resource Program. Recycling Implementation Plan – Appendices. April 1989, p. D-11.*

Los Angeles to meet or exceed its short- and long-term waste diversions goals. For the purposes of this analysis, landscape waste will be included as waste sent to landfills to provide a more conservative analysis. The total amount of waste sent to landfills (50.7 percent) also includes the remaining solid waste (non-recyclable), non-recyclable residuals, non-separated recyclables, and tailings from the recycling process

Information regarding the generation and disposal of hazardous waste associated with uses within the Proposed Project is discussed in Section IV.I, Safety/Risk of Upset in this EIR.

### **3.3.2 Residential Sustainable Performance Guidelines**

The Applicant, although not required by the City or other regulatory agency, has committed to several measures that would reduce solid waste generation through its Residential Sustainable Performance Guidelines (See Appendix M-1). These Guidelines commit to the preparation of a construction waste recycling plan that will result in the separation and recycling of wood waste, corrugated cardboard, scrap metal and dry wall. Recycled content building materials, including insulation, roofing materials, and gypsum board, will also be used. Solid waste generation will also be minimized once construction is complete by providing containers for, and public information about, recycling. As a result of the Guidelines, Playa Vista has been certified as an “Energy Star” project by the Environmental Protection Agency.

## **3.4 Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies three factors to be used in determining the significance of a project’s impacts on solid waste (see Subsection 3.2, above). The first factor is a component of the first significance threshold in that it provides guidance in terms of describing the Proposed Project’s solid waste needs. The second and third factors have been established as the Proposed Project’s significance thresholds.

The following analysis evaluates impacts of the Proposed Project. The Habitat Creation/Restoration Component would not generate notable amounts of solid waste (i.e., only minor amounts of construction debris, such as non-recyclable portions of concrete form boards and excess concrete associated with construction of the storm drain outlet to the Riparian Corridor, revegetation plant containers, etc.). Operation of the Habitat Creation/Restoration Component would generate minimal amounts of green waste, if any, from maintenance of vegetation of the Bluff and Riparian Corridor; these areas will generally be allowed to grow as natural systems, and are not anticipated to generate plant waste in notable quantities. As such, the impacts discussion below for the Proposed Project pertains specifically to solid waste impacts of the Urban Development Component.

### 3.4.1 Solid Waste Generation and Landfill Disposal Capacity

Based on the waste generation factors for construction activities, as presented above in Table 177, a total of approximately 10,343 tons of inert waste will be generated during construction (see Appendix N-3c for detailed calculations). As discussed in Subsection 2.0, Environmental Setting, adequate regional inert landfill capacity will be available for several decades. As of December 31, 1995, the total remaining permitted inert waste capacity in Los Angeles was estimated to be approximately 53.1 million tons. Based on the average 1999 disposal rate of approximately 566,000 tons per year, this capacity will be exhausted by about 2090 (i.e., 94 years). As such, construction-related waste would represent about 0.02 percent of the inert waste disposal capacity in the region, and would result in a less-than-significant impact, as the Project would not create a need for additional solid waste disposal facilities to adequately handle project-generated waste. Therefore, impacts relative to construction waste would be less than significant.

Based on raw solid waste generation rates for the types of land uses proposed in the Proposed Project, approximately 18.9 tpd of Class III solid waste (without planned diversion programs included as Project Design Features) would be generated daily at Project buildout, as indicated in Table 178 on page 1136. Based on the anticipated average diversion rate of 49.3 percent, only 50.7 percent, or approximately 9.6 tpd, would require disposal. Such source reduction on-site (as part of diversion programs proposed as Project Design Features) would serve to promote the City's overall long-term diversion goal of 70 percent by 2020. This solid waste generation, which would amount to approximately 3,504 tons per year, would represent a 0.07 percent increase in the amount of City-generated solid waste that is disposed of at Class III landfills that serve the City (i.e., 4.71 million tons per year, based on 15,100 tpd six days a week).

As discussed in Subsection 2.0, Environmental Setting, above, it is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles would be fully consumed by late 2010, although currently planned expansions occurring prior to 2010 are designed to extend landfill service life to approximately 2022. The Sanitation Districts of Los Angeles County are, in cooperation with affected jurisdictions, currently pursuing such options to increase future landfill disposal capacity, including expansion of existing landfills, permitting of new landfills and the use of rail haul. As indicated above, the extension of the Sunshine Canyon Landfill (within the City of Los Angeles) is estimated to extend its service life to 2028, and the collective service life of the four City-serving landfills to 2022. However, there is presently no guarantee that the Sunshine Canyon Landfill extension will receive a permit to operate. Consequently, the Proposed Project would result in an increase in solid waste generation (i.e., 9.6 tpd after diversion, or a 0.07 percent increase in overall disposal at the four City-serving landfills) that creates a need for additional solid waste disposal facilities to adequately handle project-generated waste (i.e., existing available landfill disposal capacity

Table 178

**PROPOSED PROJECT  
OPERATIONAL CLASS III SOLID WASTE GENERATION**

Land Use	Proposed Project	Solid Waste Generation	
		Solid Waste Generation Factor <sup>a</sup>	Projected Generation
Residential (d.u.)	2,600	0.00612 tpd/d.u.	15.912 tpd
Office (ksf)	175	0.003 tpd/ksf	0.525 tpd
Retail (ksf)	150	0.0156 tpd/ksf	2.340 tpd
Civic/Inst. (ksf)	40	0.0035 tpd/ksf	0.140 tpd
<b>Total (w/out On-Site Diversion)</b>	<b>18.917 tpd</b>		
<b>Total (with On-Site Diversion)<sup>b</sup></b>	<b>9.591 tpd</b>		

*ksf = thousand square feet      d.u. = dwelling units      tpd = tons per day*

<sup>a</sup> Solid waste generation factors are from the California Integrated Waste Management Board's website, Waste Characterization database: <http://www.ciwmb.ca.gov/WasteChar/WasteGenRates>. November, 2001.

<sup>b</sup> As described in Subsection 2.2.2, Solid Waste Disposal, diversion factor is 49.3 percent, which leaves 50.7 percent needing disposal, based on the average participation rate in the City of Los Angeles. Source: Los Angeles Resource Program, Recycling Implementation Plan – Appendices, April 1989, P.D-11.

Source: Camp Dresser & McKee, Inc., 2003.

may be fully consumed by 2010, the buildout year for the Proposed Project). Therefore, impacts to solid waste disposal facilities would be considered potentially significant because the Proposed Project would create a need for additional solid waste disposal facility to adequately handle project-generated waste.

### 3.4.2 Solid Waste Transport and Handling

Development of the Proposed Project site would include completion of an internal roadway system that would provide on-site routes for waste collection/hauling vehicles. Once off-site, however, it may be necessary to provide or otherwise identify new routes for the transport of Project-related solid wastes to off-site waste management/disposal facilities. As such, implementation of the Proposed Project may result in a significant impact due to the potential for the Proposed Project to create a need for additional solid waste collection routes to adequately handle project-generated waste.

### 3.4.3 Solid Waste Source Reduction and Landfill Diversion (AB 939)

As described above, the Project Design Features include waste separation at the source. Waste diversion is anticipated to be achieved from the existing waste diversion programs of the City, County, and private haulers. The ability of diversion programs to accommodate the

Proposed Project would be facilitated by the Project Design Feature of waste separation at the source (See Subsection 3.3.1). As described in Subsection 2.0, Environmental Setting, above, the City has programs for meeting the AB 939 landfill waste diversion requirement of 50 percent by the year 2000, and, in fact, the City has set a waste diversion goal of 62 percent by the year 2010, and 70 percent by year 2020. As discussed in Subsection 2.2.3, Solid Waste Diversion, above, in the year 2000, the City achieved an overall diversion rate of 58.8 percent. As the City endeavors to meet the 62 percent diversion goal in the coming decade, solid waste from the Proposed Project, as well as from other communities in the region, would be reduced to meet or exceed the City's 2010 minimum diversion requirements in order to be in conformance with such policies. Additionally, the Project Design Features would serve to reduce the amount of solid waste generated by the new development in the Urban Development Component. To the extent that regional plans to provide for future landfill disposal capacity incorporate growth projects (i.e., SCAG growth forecasts) that include new development within the Urban Development Component, the Project Design Features can help reduce the amount of solid waste generation that is otherwise assumed for future landfill disposal needs. The Proposed Project would be consistent with, and would apply all applicable goals, policies, and strategies of, the CiSWMPP and the associated implementation strategies of the SRRE, including such components as the Curbside Recycling Program, as outlined in the Framework Element. While this analysis assumes an on-site diversion rate of 49.3 percent, it should be noted that the diversion requirements of AB 939, as discussed above in Subsection 2.1, Regulatory Framework, apply only to cities and counties. As such, the Proposed Project's anticipated on-site diversion programs would serve to enhance the ability of the City of Los Angeles to meet or exceed its existing overall diversion rate of 58.8 percent, as well as the long-term goals of 62 percent diversion by 2010 and 70 percent diversion by 2020. The Proposed Project would comply with, and implement as necessary, all provisions of the aforementioned City policies and programs to achieve the waste diversion goals of AB 939. Aspects of the Proposed Project that are particularly responsive to the City's plans, policies, and programs referenced above relative to AB 939 include the Project Design Features requiring bins for recycling of paper and landscaping materials and for commingled recyclable materials, and the Residential Sustainable Performance Guidelines. As such, the Proposed Project would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Impacts relative to adopted solid waste diversion programs and policies would be less than significant.

#### **3.4.4 Summary of Impacts**

In summary, construction activities would generate a total of 10,343 tons of inert waste; however, the Proposed Project would not create a need for additional inert solid waste disposal facilities to adequately handle project-generated inert waste. Thus, construction-related waste would result in a less-than-significant impact. Operation of the Proposed Project would generate



solid waste (i.e., 9.6 tpd after diversion, or a 0.07 percent increase in overall disposal at the four City-serving landfills) that would require disposal at regional landfills, although diversion and recycling programs would reduce the amount requiring disposal. It is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles may be fully consumed at project buildout in late 2010. The Sanitation Districts of Los Angeles County are, in cooperation with affected jurisdictions, currently pursuing such options to increase future landfill disposal capacity, including expansion of existing landfills, permitting of new landfills and the use of rail haul. However, there is presently no guarantee that new or expanded disposal facilities will be permitted to operate prior to 2010. Consequently, the Proposed Project would create a need for additional solid waste disposal facilities to adequately handle project-generated Class III waste. Impacts to Class III solid waste disposal facilities would, therefore, be considered potentially significant. Because the Proposed Project could create a need for additional solid waste collection routes to adequately handle project-generated waste, impacts to solid waste collection routes would be considered potentially significant. With implementation of on-site diversion and recycling programs during construction and operation, the Proposed Project would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Impacts relative to adopted solid waste diversion programs and policies would be less than significant. Mitigation measures are proposed below to require implementation of the Project Design Features, which serve to eliminate potential significant impacts discussed above.

### **3.5 Equivalency Program Impacts**

The preceding solid waste analysis addressed impacts associated with construction and operation of the Proposed Project relative to projected solid waste generation and adequacy of solid waste collection routes and disposal capacity. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

Solid waste impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased solid waste impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to collection routes under the Equivalency Program would be similar to the Proposed Project, as the Equivalency Program would still create a need for additional solid waste collection routes. As such, construction impacts would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since Project construction would not create a need for additional solid waste collection route, or recycling or disposal facility to adequately handle Project-generated waste, and Project construction would not conflict with solid waste policies

and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Operational municipal solid waste generation under the Equivalency Program would, under all development scenarios (i.e., variations in office, retail, and assisted living development patterns, while residential and community-serving would be unchanged), result in greater municipal solid waste disposal impacts than under the Proposed Project. As shown in Table 179 on page 1140, municipal solid waste generation would increase under all three of the analyzed Equivalency Scenarios. The first scenario under the Equivalency Program (i.e., All Retail), in which no assisted living units would be developed and the reduced office uses would be transferred to retail development, would generate 19.429 tpd of municipal solid waste, which represents an increase of approximately 0.512 tpd (2.7 percent increase) from Proposed Project generation. Under the second scenario (i.e., All Assisted Living), in which retail uses would be equal to those under the Proposed Project, yet in which the maximum number of assisted living units are constructed and office uses are reduced, municipal solid waste generation would be increased over that which would occur under the Proposed Project. As Table 179 illustrates, the All Assisted Living scenario would result in a total Solid Waste generation of 19.595 tpd, which represents an increase of 0.678 (3.6 percent increase) over the Proposed Project. The analysis of the Equivalency Program also considered other equivalency scenarios in which some proportion of assisted living units and retail development would be constructed while office uses would be minimized (as in the first scenario). Under these equivalency scenarios the amount of solid waste generation would vary depending on the amount of retail and assisted living units constructed. Based on an analysis of a number of different equivalency scenarios, the greatest solid waste generation would occur when the maximum number of assisted living units (i.e., 200 units) are constructed along with additional retail uses (i.e., 45,877 sq.ft.), due to the fact that assisted living units generate more municipal solid waste than retail uses. As such, as illustrated in Table 179, the municipal solid waste generation under the Retail/Assisted Living scenario of the Equivalency Program would be 20.008 tpd, which represents an increase of 1.091 tpd (5.8 percent increase) over the Proposed Project.

Overall, based on the fact that, compared to the Proposed Project, the fluctuations in solid waste generation under all development scenarios of the Equivalency Program are equal to or less than 5.8 percent, the impacts relative to the Proposed Project are not substantial, although, as discussed above, given the projected shortfall in municipal solid waste disposal capacity projected to occur by 2010, impacts under the Equivalency Program, as is the case with the Proposed Project, would be considered significant. However, implementation of applicable Project Design Features (as discussed above in Subsection 3.3, Project Design Features) would minimize solid waste generation to the maximum extent practicable. As such, although the Equivalency Program, as is the case with the Proposed Project, would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the

Table 179

## MUNICIPAL SOLID WASTE GENERATION – PROPOSED PROJECT AND EQUIVALENCY SCENARIOS

Land Use	Generation Factor (tpd/unit)	Equivalency Scenario: All Retail		Equivalency Scenario: All Assisted Living		Equivalency Scenario: Retail/Assisted Living	
		Amount of Development	Amount of Generation	Amount of Development	Amount of Generation	Amount of Development	Amount of Generation
Solid Waste Generation (tpd)							
Residential (d.u.)	0.00612	2,600	15.912	2,600	15.912	2,600	15.912
Office (ksf)	0.003	50	0.150	150.90	0.453	50	0.150
Retail (ksf)	0.0156	206.832	3.227	150	2.340	195.877	3.056
Community Serving (ksf)	0.0035	40	0.140	40	0.140	40	0.140
Assisted Living (units/rooms)	0.00375	0	0.000	200	0.750	200	0.750
<b>Total</b>			<b>19.429</b>		<b>19.595</b>		<b>20.008</b>
Proposed Project			18.917		18.917		18.917
<b>Over/(Under) Proposed Project</b>			<b>0.512</b>		<b>0.678</b>		<b>1.091</b>

*tpd = tons per day ksf = thousand square feet d.u. = dwelling unit*

*Source: Camp Dresser & McKee, Inc., 2003.*

Curbside Recycling Program (including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE), it would create a need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste, which is greater than that projected to occur under the Proposed Project. Therefore, impacts under the Equivalency Program, as is the case with the Proposed Project, would be considered potentially significant relative to municipal solid waste disposal capacity.

### 3.6 Impacts of Off-Site Improvements

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue. These off-site improvements are all located in developed urban areas. All of the off-site improvements, with the exception of the water regulator station, would occur within, or adjacent to, existing roadways. The water regulator station includes a small amount of above-ground piping equipment, a common element of the urban environment. Implementation of the Project's mitigation measures does not involve the construction of any buildings.

The construction of the off-site improvements would generate solid waste in the form of construction debris. There currently exists sufficient inert landfill capacity in the Los Angeles region at current disposal rates (i.e., approximately 90 years of capacity) to dispose of all off-site roadway improvement-related construction/demolition debris. As such, the amount of inert waste that would be generated would not be so substantial as to significantly impact the existing disposal system or landfill capacity. No new collection routes, or recycling or disposal facilities would be required to handle waste generated by the construction of the proposed improvements. Furthermore, a recycling program for demolition and construction debris is proposed as mitigation to further limit impacts to regional landfill capacity (see Subsection 4.0, Mitigation Measures, below), and facilitate compliance with applicable waste diversion programs. Additionally, all handling, transport, and disposal of debris during construction activities would comply with all applicable statutes and regulations related to solid waste. Operation of the proposed off-site improvements would not generate any solid waste.

Therefore, the proposed improvements would not create a need for additional solid waste collection routes, or recycling or disposal facility to adequately handle project-generated waste, and would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. As such, solid waste impacts from implementation of proposed off-site mitigation improvements would be less than significant.

#### **4.0 MITIGATION MEASURES**

##### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- All buildings constructed or uses established within any part of the site shall be designed to be permanently equipped with clearly marked, durable, commingled recyclables bins at all times to facilitate the separation and deposit of recyclable materials therein by tenants and grounds keepers; and the placement of, and approaches to, such bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities, in a manner satisfactory to the City Department of Public Works, prior to issuance of building permits.
- The Applicant shall execute a covenant satisfactory to the City Planning Department which shall obligate the owner, lessee, heirs, assigns, or successors to: continuously maintain in good order for the convenience of tenants, clearly marked, durable and separate bins on the same lot, or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic

- therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
- The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall comply with applicable existing and future regulations and procedures for the collection and disposal of household hazardous waste, providing such future compliance does not conflict with existing tract map requirements.
  - The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall be required to implement a recycling program for demolition and construction debris, where economically feasible, to the satisfaction of the City Departments of Public Works, Building and Safety, and/or City Planning, as applicable.
  - Recycled materials, including drywall, steel, aluminum, ceramic tile, cellulose insulation and composite engineered wood products, shall be incorporated into building design and construction where economically feasible and where compatible with design objectives.
  - Determination of new solid waste collection routes shall be coordinated with existing collection routes in the project area, depending on the waste haulers serving the Proposed Project site.

## **5.0 UNAVOIDABLE ADVERSE IMPACTS**

The Proposed Project would create an incremental increase in solid waste disposal in the City of Los Angeles. Construction of the Proposed Project, inclusive of the Project's Equivalency Program and off-site improvements, would not result in an increase in inert solid waste generation that would create a need for additional inert solid waste disposal facilities to adequately handle project-generated inert waste. Thus, construction-related waste would result in a less-than-significant impact. Operation of the Proposed Project would generate an estimated 9.6 tons per day of Class III solid waste (3,504 tons per year), which would require landfill disposal. Furthermore, the Equivalency Program would generate a maximum additional 0.678 tpd of Class III solid waste, 0.344 tons per day of which would require landfill disposal (with comparable diversion), which represents an increase of 3.6 percent over the Proposed Project. This additional refuse will add to the demand for a comprehensive, long-term solution for solid waste disposal. It is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles may be fully consumed by late 2010. Despite efforts to site and permit solid waste disposal facilities, there is presently no

guarantee that new or expanded disposal facilities will be permitted prior to 2010. Consequently, the Proposed Project, inclusive of the Equivalency Program, would result in an increase in solid waste generation (i.e., a 0.09 percent increase in overall disposal at the four City-serving landfills) that would create a need for additional Class III solid waste disposal facilities to adequately handle project-generated waste. Therefore, impacts to Class III solid waste disposal facilities from implementation of the Proposed Project and Equivalency Program would be considered a significant unavoidable adverse impact. Operation of the Project's off-site improvements would not generate any inert or solid waste; thus, impacts to solid waste disposal facilities would be less than significant.

Additionally, the Proposed Project, inclusive of the Equivalency Program, could create a need for additional collection routes to adequately handle project-generated waste; however, the mitigation measure identified above would reduce the impact to a level less than significant.

The Proposed Project, inclusive of the Equivalency Program and off-site improvements, would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Consequently, impacts relative to adopted solid waste diversion programs and policies would be less than significant.

## **6.0 CUMULATIVE IMPACTS**

As shown in Table 180 on page 1144, the projected inert waste from construction of the Proposed Project, in conjunction with that from construction of related projects throughout the Los Angeles region and other background growth, would be approximately 155,500 tons. This amount of inert solid waste would be generated over a number of years, as in the case of the Proposed Project, whereas the daily increase in inert waste disposal at inert waste landfills in the Los Angeles region would be a small percentage of the total amount, the specific amount of which is dependent upon the respective construction schedules of the related projects. Nonetheless, given the inert waste disposal capacity (1995) within Los Angeles County of 53.1 million tons, the total cumulative construction-related inert waste (155,500 tons) would represent 0.3 percent of the total inert disposal capacity in the region. The Proposed Project, Equivalency Program, and off-site improvements, in conjunction with related projects and other background growth, would not create a need for additional inert waste disposal facilities to adequately handle project-generated inert waste.

As shown in Table 181 on page 1145, the projected Class III solid waste generation for the Proposed Project in conjunction with that of related projects located within the City of Los Angeles (i.e., projects within the City of Los Angeles that would utilize the four City-serving

Table 180

## CONSTRUCTION-RELATED CUMULATIVE INERT WASTE GENERATION

	Land Use <sup>4</sup>	Wood General Factors (tons/ unit)	Drywall General Factors (tons/ unit)	Metal General Factors (tons/ unit)	Concrete General Factors (tons/ unit)	Concrete/ Asphalt	Corrugated Asphalt Factors (tons/ unit)	Other Waste General Factors (tons/ unit)	Other Waste	Total				
Residential (d.u.) <sup>a</sup>	15,190	0.320	4,860.8	0.736	11,179.8	0.072	1,093.7	1.432	21,752.1	0.000	0.0	1.232	18,714.1	57,600.5
Office (ksf) <sup>b</sup>	16,043	0.680	10,909.1	0.050	802.1	0.000	0.0	0.000	0.0	0.140	2,246.0	0.270	4,331.6	18,288.8
Retail (ksf) <sup>b</sup>	4,373	0.680	2,973.8	0.050	218.7	0.000	0.0	0.000	0.0	0.140	612.3	0.270	1,180.8	4,985.5
Hotel (rooms) <sup>a</sup>	4,738	0.320	1,516.1	0.736	3,486.9	0.072	341.1	1.432	6,784.4	0.000	0.0	1.232	5,836.8	17,965.4
Civic/Inst. (ksf) <sup>c</sup>	2,372	0.860	2,039.6	0.220	521.8	0.210	498.0	0.990	2,347.9	0.000	0.0	0.540	1,280.7	6,688.0
Warehouse (ksf) <sup>c</sup>	394	0.860	338.5	0.220	86.6	0.210	82.7	0.990	389.7	0.000	0.0	0.540	212.6	1,110.1
Restaurant (ksf) <sup>b</sup>	212	0.680	144.3	0.050	10.6	0.000	0.0	0.000	0.0	0.140	29.7	0.270	57.3	241.9
Theater (ksf) <sup>c</sup>	86	0.860	73.8	0.220	18.9	0.210	18.0	0.990	84.9	0.000	0.0	0.540	46.3	241.9
Industrial (ksf) <sup>c</sup>	17,130	0.860	14,731.7	0.220	3,768.6	0.210	3,597.3	0.990	16,958.6	0.000	0.0	0.540	9,250.2	48,306.4
<b>Total (tons)</b>			<b>37,587.8</b>		<b>20,094.0</b>		<b>5,630.8</b>		<b>48,317.7</b>		<b>2,888.0</b>		<b>40,910.3</b>	<b>155,428.5</b>

d.u. = dwelling units

ksf = thousand square feet

<sup>a</sup> Residential and Hotel calculations assume 800 square feet per dwelling unit and hotel room on average. As such, original Residential Multi-Unit Construction factors multiplied by 0.8 (originally tons/1,000 sq.ft.).

<sup>b</sup> Office, Retail, and Restaurant uses were evaluated using the Commercial Low-Rise Construction factor.

<sup>c</sup> Civic/Institutional, Warehouse, Theater, and Industrial uses were evaluated using the Institutional Low-Rise Construction factor, based on the highest content of concrete and metal waste, typically associated with "big box" or similar development. Assumed 23 square feet per theater seat.

<sup>d</sup> Due to the nature of inert waste, and the present abundance of inert landfill capacity in the region, inert waste disposal facilities (landfills) do not restrict waste from various jurisdictions – as such, related projects are all assumed to utilize any or all of the regional inert waste facilities. Land use statistics include the Proposed Project, as well as background growth (25 percent for residential and 10 percent for all non-residential [all other] land uses).

Sources: City of Santa Monica Green Building Program, Solid Waste Division, "Construction Projects – Typical Waste Generation Rates," table on website (<http://greenbuildings.santamonica.org/appendices/apawastegeneration.html>); Skyscrapers.com Data Committee (SDC) [www.skyscrapers.com/english/about/sdc/introduction/index.html](http://www.skyscrapers.com/english/about/sdc/introduction/index.html), accessed January 29, 2003 (for high-rise/low-rise definition).

Table 181

## CUMULATIVE CLASS III SOLID WASTE GENERATION

	Land Use					Units	Solid Waste Generation (tpd)			
	Proposed Project	Related Projects within City of Los Angeles*	Background Growth	Proposed + Related Projects + Background Growth	Generation Factor <sup>b</sup>		Proposed Project	Related Projects within City of Los Angeles*	Background Growth	Proposed + Related Projects + Background Growth
Residential(d.u.)	2,600	5,718	2,080	10,398	0.00612	tpd/d.u.	15.912	34.994	12.727	63.633
Office (s.f.)	175,000	5,918,796	609,380	6,703,176	0.000003	tpd/s.f.	0.525	17.756	1.828	20.110
Retail (s.f.)	150,000	726,564	87,656	964,220	0.0000156	tpd/s.f.	2.340	11.334	1.367	15.042
Hotel (rooms)	0	1,650	165	1,815	0.00221	tpd/room	0.000	3.647	0.365	4.011
Civic/Inst. (s.f.)	40,000	389,300	42,930	472,230	0.0000035	tpd/s.f.	0.140	1.363	0.150	1.653
Warehouse (s.f.)	0	190,000	19,000	209,000	0.0000295	tpd/s.f.	0.000	5.605	0.561	6.166
Restaurant (s.f.)	0	60,909	6,091	67,000	0.000007	tpd/s.f.	0.000	0.426	0.043	0.469
Theater (seats)	0		0	0	0.000359	tpd/seat	0.000	0.000	0.000	0.000
Industrial (s.f.)	0	14,593,500	1,459,350	16,052,850	0.0000312	tpd/s.f.	0.000	455.317	45.532	500.849
Parking (spaces)	0	1,815	182	1,997	0	tpd/space	0.000	0.000	0.000	0.000
<b>Total</b>							<b>18.917</b>	<b>530.443</b>	<b>62.572</b>	<b>611.931<sup>c</sup></b>

tpd = tons per day      d.u. = dwelling unit      s.f. = square feet

Generation factors are from the California Integrated Waste Management Board Website, Waste Characterization Database, Solid Waste Generation Rates – <http://www.ciwmb.ca.gov/WasteChar/WasteGenRates/default.htm>.

\* Related projects within the City of Los Angeles would utilize the same collective landfill disposal sources, which are the basis for cumulative impacts analysis; all such projects are those within the City that are assumed to be served by the four City-serving landfills.

<sup>a</sup> Background growth adds 25 percent for residential development and 10 percent for non-residential development (all other uses) to consumption/generation totals to account for growth of related projects that are not subject to environmental review. In other words, residential consumption/generation rates are 25 percent higher and all other rates are 10 percent higher than would otherwise be quantified. See Appendix N-3d for detailed calculations.

<sup>b</sup> Generation/consumption factors were derived assuming 23 ft<sup>2</sup> for each theater seat, 33 ft<sup>2</sup> for each restaurant seat, 850 ft<sup>2</sup> for each hotel room, 212 ft<sup>2</sup> for each school student, and 154 ft<sup>2</sup> for each parking space. See Appendix N-4 for detailed factor derivations.

<sup>c</sup> Under the Project's Equivalency Program, cumulative Class III solid waste generation would increase by a maximum of 0.678 tpd, 0.344 tpd of which would require landfill disposal (with comparable diversion), which presents an increase of 0.0006 percent in cumulative Class III solid waste disposal.

Source: Camp Dresser & McKee Inc. 2003



landfills discussed above) and other background growth would be 611.9 tpd. Detailed calculation spreadsheets of solid waste generation for the cumulative projects and other background growth are presented in Appendix N-3d.

The volume of Class III solid waste generated by the Proposed Project (inclusive of the Equivalency Program), related projects, and other background growth would adversely impact regional landfill capacity. The potential impacts will be partially offset by ongoing efforts and programs involving waste diversion and recycling. It is anticipated that such diversion and recycling as related to cumulative development and other background growth will occur primarily through local jurisdictional requirements for new development. Assuming a similar level of waste diversion is applied to the waste streams of the related projects (49.3 percent diversion), which is generally consistent with the requirements of AB 939 that all cities and counties achieve a 50 percent diversion rate by 2000, approximately 310.2 tpd would require landfill disposal.

The cumulative increase in solid waste disposal (310.2 tpd, or 113,223 tons per year) would represent an approximately 2.1 percent increase (based on daily tonnage) in the amount of solid waste sent to the four City-serving landfills (15,100 tpd, or 4.71 million tons per year [based on landfill operations 6 days per week]). As indicated above, the solid waste generated by the Proposed Project (i.e., 9.6 tpd after diversion) would represent a 0.07 percent increase in the amount of solid waste sent to those landfills, and 3.7 percent of the cumulative increase in solid waste disposal. The Project's Equivalency Program would generate a maximum additional 0.678 tpd of Class III solid waste, 0.344 tons per day of which would require landfill disposal (with comparable diversion), which represents an increase of 0.0006 percent in cumulative Class III solid waste disposal. It is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles (including the Proposed Project and related projects within the City) may be fully consumed by late 2010. Despite efforts to site and permit solid waste disposal facilities, there is presently no guarantee that new or expanded disposal facilities will be permitted prior to 2010. Consequently, the Proposed Project, in conjunction with related projects and background growth, could create a need for additional solid waste disposal facilities to adequately handle project-generated waste. Therefore, impacts to solid waste disposal facilities would be considered a potentially significant cumulative impact. Operation of the Project's off-site improvements would not generate any inert or solid waste; thus, the off-site improvements would not contribute to cumulative solid waste disposal impacts.

Furthermore, the cumulative solid waste generation associated with the Project (including the Equivalency Program), related projects, and background growth could create a need for additional solid waste collection routes to adequately handle project-generated waste, which is considered a potentially significant cumulative impact; however, it is anticipated that such future development, as is the case with the Proposed Project, would be coordinated with applicable public and private waste haulers with regard to solid waste collection services, which could

mitigate potentially significant impacts to solid waste collection services. Nonetheless, because such coordination for related projects cannot be assured as part of, or in conjunction with, the Proposed Project, the cumulative impact is considered potentially significant. Operation of the Project's off-site improvements would not generate any inert or solid waste; as such, no additional collection routes would be required, and no cumulative impacts to solid waste routes would occur.

It is anticipated that the Proposed Project and other related projects would not conflict with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE, based on the programs in place within respective jurisdictions to meet such diversion requirements. Impacts to solid waste policies and objectives intended to help achieve the requirements of AB 939 from implementation of the Proposed Project, Equivalency Program, and off-site improvements would not be cumulatively significant.

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## **IV. ENVIRONMENTAL IMPACT ANALYSIS**

### **O. VISUAL QUALITIES (AESTHETICS AND VIEWS)**

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#### **1.0 INTRODUCTION**

This section of the EIR addresses the changes that would occur in the appearance of the Project site due to implementation of the Proposed Project. The analysis includes two components. The first, Aesthetics, pertains to the character of the Project site in relationship to its surroundings. It deals with topics such as building height, mass, and location, and the relationship between buildings, open space, and adjacent uses.

The second component, Views, pertains to changes in the overall view experienced around the Proposed Project site. It focuses on how the Project would appear in the context of existing view corridors, whether new development would interfere with views of visual resources and/or whether development would blend with or alter the existing view.

The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

#### **2.0 ENVIRONMENTAL SETTING**

##### **2.1 Regulatory Framework**

The City of Los Angeles implements its General Plan through its Planning and Zoning Code and Specific Plans. A Specific Plan was developed for Playa Vista Area D, concurrent with the area's annexation into the City, and received final approval in November 1985. Subsequently, the Specific Plan was amended in 1996. The intent of the Specific Plan for Area D is to provide, together with the regulations set forth in the Planning and Zoning Code, regulatory controls and incentives for the systematic implementation of that portion of the Westchester-Playa del Rey Plan which includes the Proposed Project site

Section 7, Design Review and Standards and Section 8, Landscape Standards of the currently existing Playa Vista Area D Specific Plan, City of Los Angeles Ordinance 160,523 (170,785 as amended), provides a number of guidelines relative to aesthetic quality which must be followed as part of project compliance with the Westchester-Playa del Rey District Plan. These guidelines require that: (1) buildings be designed with equal consideration to all elevations visible from adjacent major public streets, plazas or pedestrian walkways; (2) colors and types of exterior building materials and the facade of parking structures be designed to reasonably

complement the exterior of adjoining structures; (3) façades or landscaping of parking structures be designed to substantially screen automobiles when viewed from adjacent major public streets, plazas, or pedestrian walkways; (4) buildings be designed to adequately screen mechanical equipment when viewed from adjacent major public streets, plazas, or pedestrian walkways; (5) landscaping be provided in open areas not utilized for buildings, driveways, parking areas, recreational facilities or walks; (6) signs be appropriate given their proposed location, size and purpose; (7) buffering from potentially incompatible uses; and (8) landscaping be provided per a landscape plan prepared by a landscape architect.

## **2.2 Existing Conditions**

Visual characteristics of the environmental setting are graphically illustrated in Figure 97 through Figure 100 on the following pages. Figure 97 on page 1150 provides a map of the regional context for the Proposed Project and an identification of the existing view resources that were considered in the analysis of visual impacts. View resources are special or particularly attractive visual features that are valued by a nearby population (i.e. what can be seen). Figure 98 on page 1151 identifies the land uses that surround the Proposed Project site, and off-site viewing locations that were used for the analysis of view impacts. Viewing locations are the specific areas from which a view resource is visually apparent to a nearby population (i.e. from where you see it). Figure 99 on page 1152 and Figure 100 on page 1153 provide photographs of views over the Proposed Project site, from the view locations identified on Figure 98.

### **2.2.1 Regional Context**

Inland of Santa Monica Bay, approximately two miles to the west, the Proposed Project is located on a portion of an ancient alluvial plain that once contained a course of the Los Angeles River to the Pacific Ocean. As such, the site sits in a lowland with elevations raising outward from the Project site. The increase in elevation to the south of the Project site is sudden, with the Westchester Bluffs rising approximately 120 feet above the Project site to 140 feet above mean sea level (AMSL). The increases in ground elevation to the north and east are more gradual, with surrounding cityscape extending through the Los Angeles Basin to the distant Santa Monica Mountains with their sudden rise in elevation. The regional context, and main elements which shape the viewing environment, are shown in Figure 97 on page 1150.

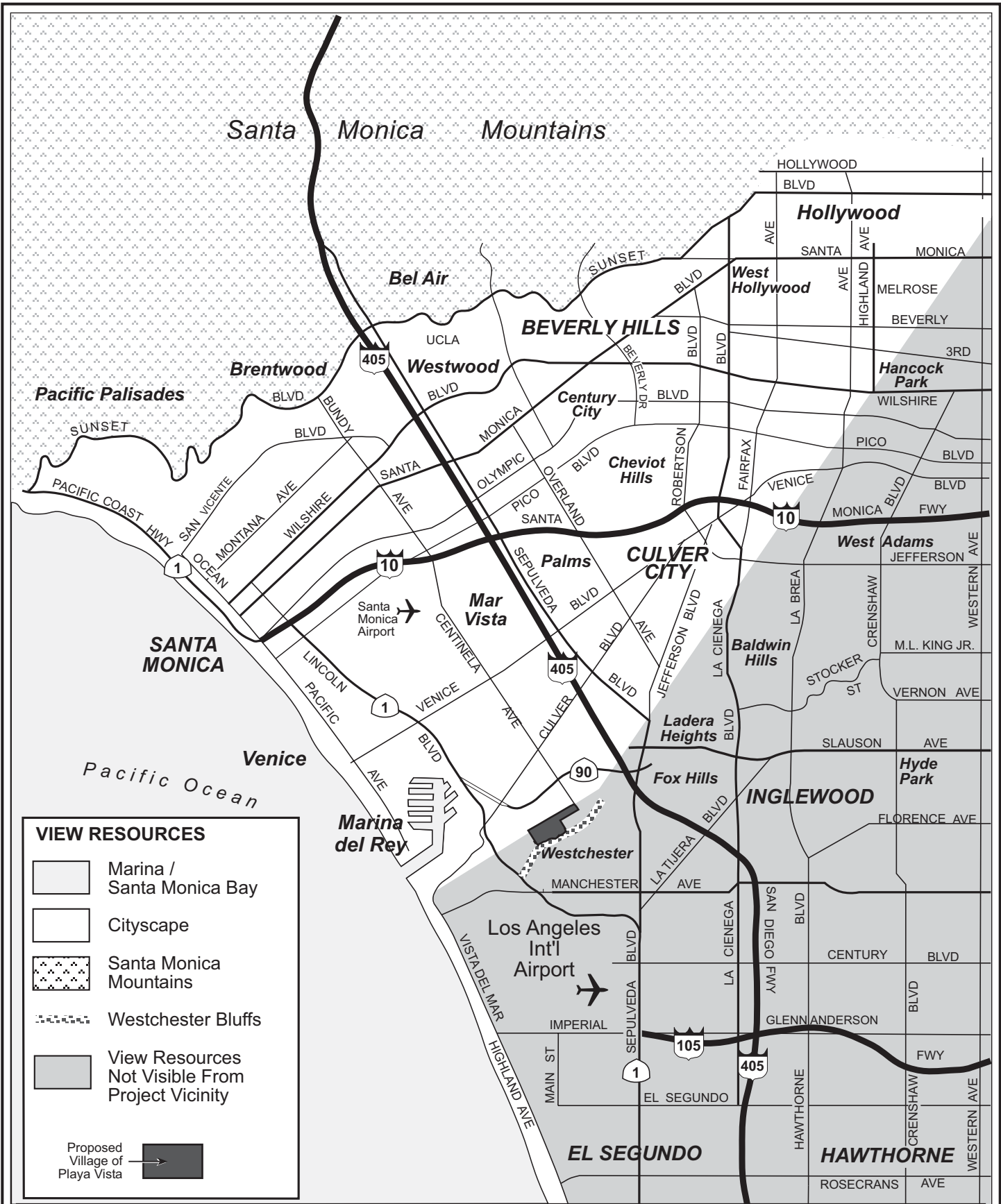
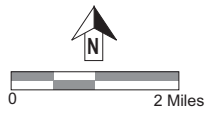
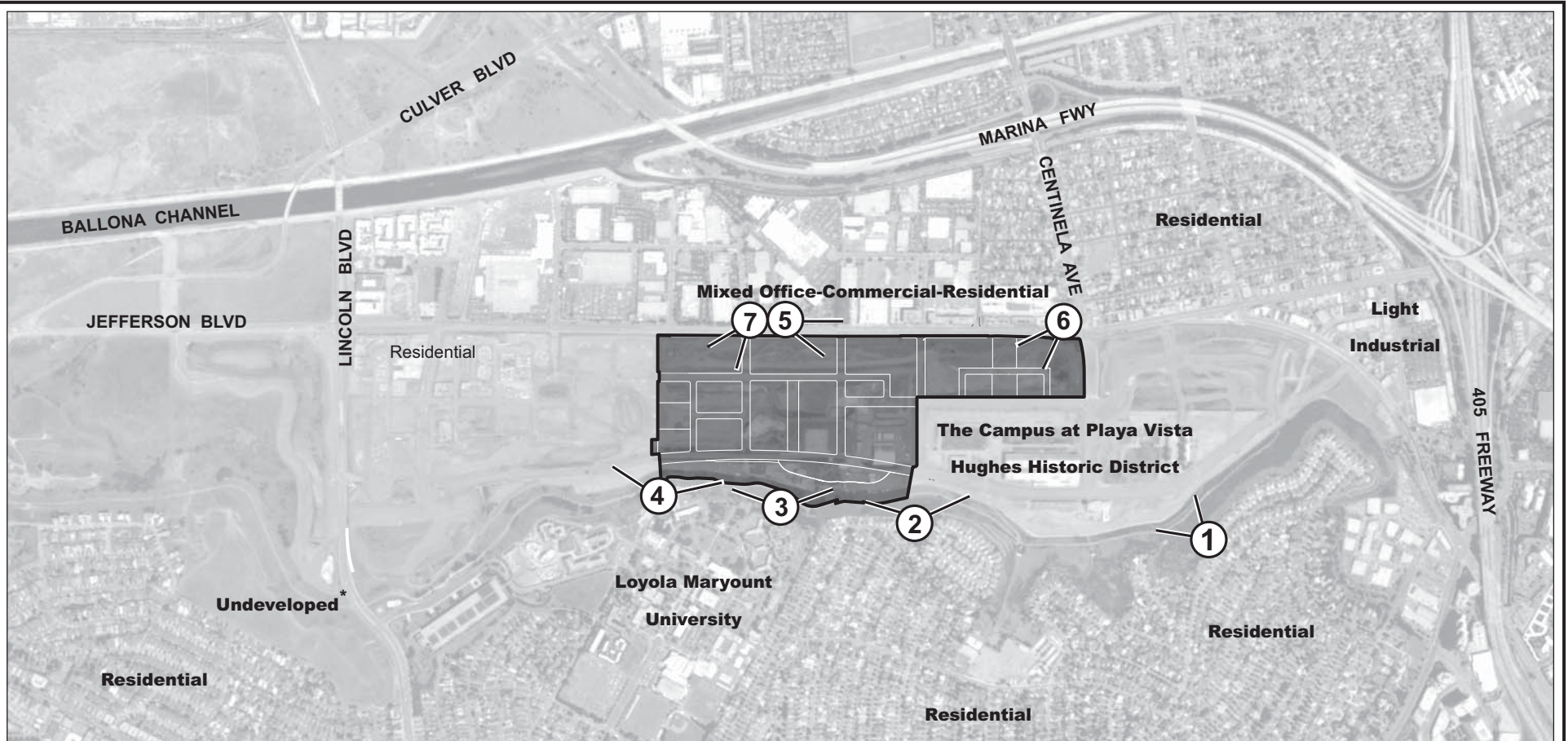


Figure 97  
**Regional Context  
 and View Resources**



Source: PCR Services Corporation, 2003



\* Related Project No. 24 - Proposed 120 Residential Units

**LEGEND**

Photo View Area



Photo Number

(Photo Locations for figure 99 & 100)

Proposed Village at Playa Vista



Figure 98  
Surrounding Land Uses  
and View Locations



Photo 1

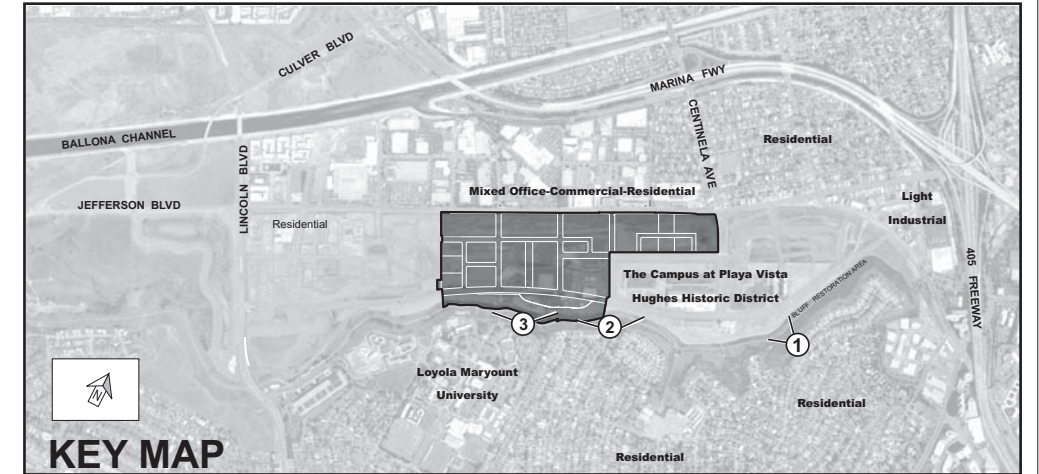


Photo 2

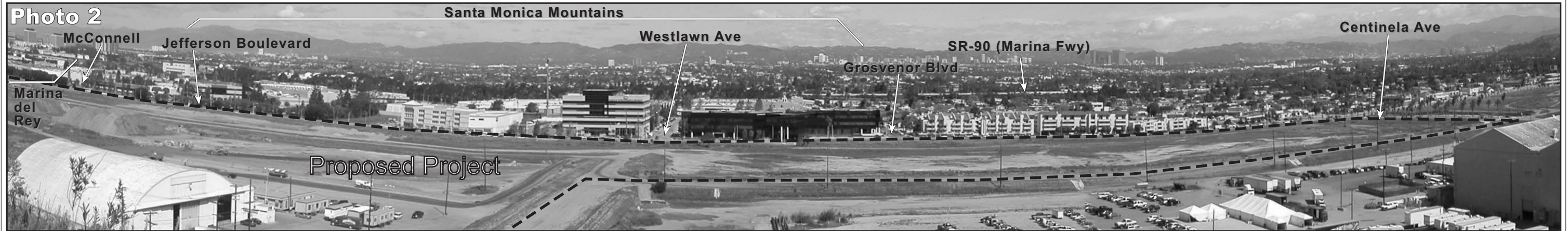


Photo 3



Figure 99  
Photographs: Existing Views From the  
Westchester Bluffs

SOURCE: PCR Services Corporation, July 2003



Photo 4



Photo 5

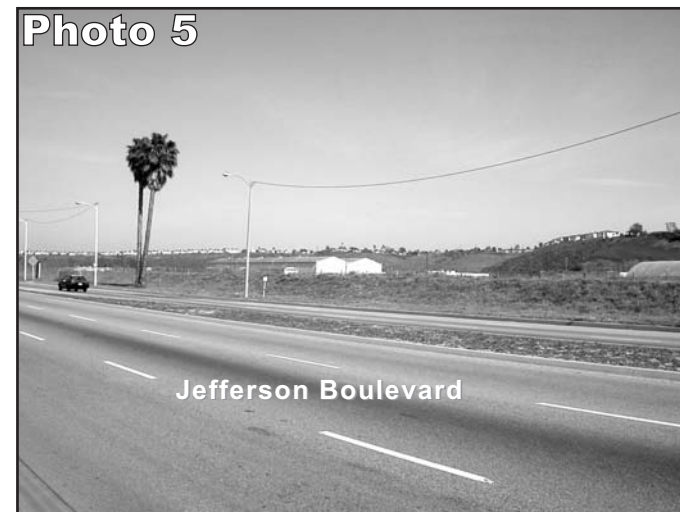
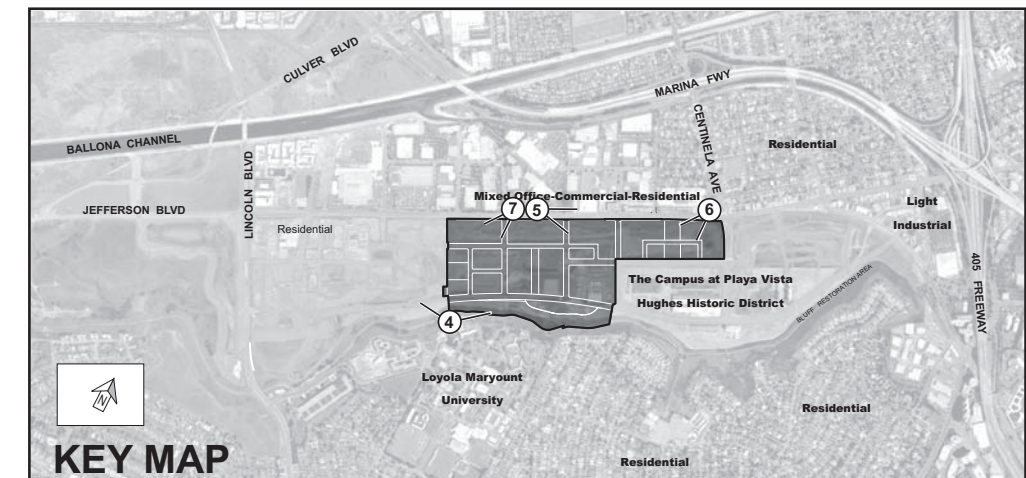


Photo 6



Photo 7





## **2.2.2 View Resources**

### **2.2.2.1 The Proposed Project Site**

The predominantly undeveloped Proposed Project site is considered a view resource because it provides a pocket of undeveloped land, in contrast to the surrounding area's urbanized setting. The portion of the Proposed Project site that is slated for urban development is flat and vacant except for two former plant site buildings, with remnants of past manufacturing and airstrip uses. There are two buildings on the Proposed Project site, which remain from the former Hughes Aircraft Company/ McDonnell Douglas Helicopter plant. Building 22 is a warehouse used for storage and Building 45 is used occasionally for filming and other activities. Other small buildings, such as shed, minor storage structures, and construction trailers associated with development of the adjacent Playa Vista First Phase Project also exist in the Former Salvage Yard area of the Proposed Project site.

The Proposed Project site is currently used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, including stockpiling excavated soils, temporary stormwater detention, rock crushing and stockpiling, and equipment staging and parking. A roadway which bisects the Proposed Project site (Runway Road) is also under construction as part of the adjacent Playa Vista First Phase Project, to connect the east and west ends of the Playa Vista First Phase Project site. The finished grade of this roadway would occur at an elevation approximately 15 to 20 feet above the existing topography (i.e., the road would occur as an elevated strip through the Proposed Project site). (Photos Nos. 2 and 3 on Figure 99 on page 1152 and Photo 4 on Figure 100 on page 1153.) In these disturbed areas, on-site vegetation includes weeds and non-native species.

The Project's Habitat Creation/Restoration Component includes that portion of the bluffs within the Proposed Project boundary to the south of the proposed urban development area and a narrow drainage ditch along the foot of the bluffs. The bluffs are a notable geological feature and landmark in the area. (Photos No. 6 and 7 on Figure 100 on page 1153.)

### **2.2.2.2 View Resources Surrounding the Proposed Project Site**

#### **2.2.2.2.1 Playa Vista First Phase Project – Undeveloped Areas**

The land immediately to the east and west of the Proposed Project site has been approved for development and the land ¼ miles to the west is already under construction for residential uses. The land to the east of the Proposed Project site is approved for office and commercial uses, including entertainment, media and technology uses. Former Hughes Aircraft Company/McConnell Douglas Helicopter plant buildings are located within this area. The undeveloped portions of the adjacent Playa Vista First Phase Project contribute, with the Proposed Project, to the relief from development amid the urban setting. The appearance of the

First Phase site is shaped by the existing construction of new buildings, infrastructure/roadways, and use of the site for surcharging. On-site vegetation includes weeds and non-native species.

#### **2.2.2.2.2 Westchester Bluffs**

The Westchester Bluffs extend beyond the Proposed Project site, and offer a scenic view over the site and the adjacent Playa Vista First Phase Project. (Photo Nos. 5, 6, and 7, in Figure 100 on page 1153). These bluffs rise to an average of 140 feet AMSL. While some of the bluffs are in a more natural state, large areas have been modified by erosion, the installation of erosion control drainage channels, service roads, development and non-native vegetation. Other modifications include the large “LMU” letters identifying Loyola Marymount University atop the bluff, and one building set into the bluff at Lincoln Boulevard. Views of the bluffs are afforded principally to persons traveling along Jefferson Boulevard. Other views of the bluffs are available from portions of the Marina Freeway to the north of the site, from the Project site itself and from the Playa Vista First Phase Project located on the north and south sides of Jefferson Boulevard.

#### **2.2.2.2.3 Marina del Rey Main Channel and Santa Monica Bay**

Santa Monica Bay and the Marina del Rey Main Channel are located approximately two miles west of the Proposed Project. Distant views of the ocean waters and marina entryway are available from the bluffs south of the Proposed Project. Views to the interior waters of Marina Del Rey from the bluffs are obstructed by existing buildings within the Marina itself (Photo Nos. 1, 2, and 3 on Figure 99 on page 1152 and Photo No. 4 in Figure 100 on page 1153).

#### **2.2.2.2.4 Cityscape**

The Proposed Project site is surrounded by urban development in communities extending throughout the Los Angeles basin. The communities offer a city-view from higher elevations. The character of the view varies from daytime to nighttime. During the daytime, the West Los Angeles and Santa Monica communities and general form of the city can be identified. These areas can be seen from the bluffs, with different portions of the basin being viewable from various locations along the edge of the bluffs (Photo Nos. 1, 2, and 3 in Figure 99 on page 1152 and Photo No. 4 in Figure 100 on page 1153). During nighttime hours, the nearby West Los Angeles and Santa Monica areas exhibit a “city-lights” panorama from elevated, unobstructed vantages. Nearby development and surface street lighting provide low-level ambient nighttime illumination that blend with the more distant city panorama.

#### **2.2.2.2.5 Santa Monica Mountains**

The Santa Monica Mountains are a natural feature defining the northern edge of the West Los Angeles area. On clear days, the mountains are visible at a distance in the background of

views from the bluffs south of the Project site (Photo Nos. 2 and 3 on Figure 99 on page 1152 and Photo No. 4 on Figure 100 on page 1153). However, intervening development in the Los Angeles basin obscures some of the natural features of the mountains.

### **2.2.3 Character of Surrounding Areas**

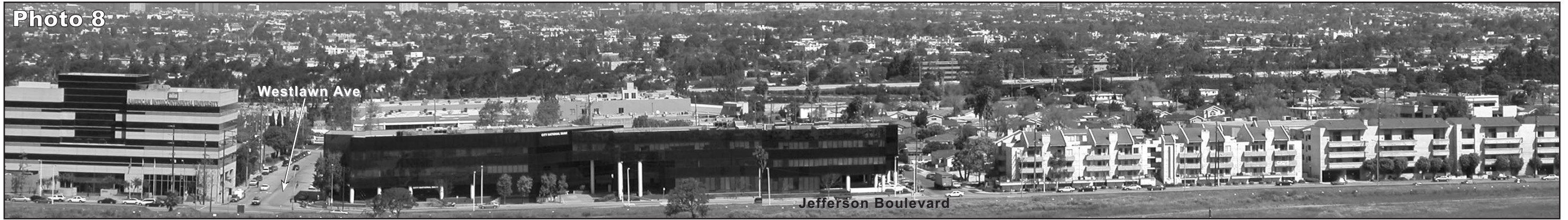
The uses in the vicinity of the Proposed Project site are portrayed in Figure 101 on page 1157. Land immediately to the west of the Proposed Project site is approved for development as part of the Playa Vista First Phase Project, with construction already underway approximately 0.25 mile to the west of the Proposed Project site and extending to Lincoln Boulevard. The vacant land is in a degraded appearance with remnants of past use, ruderal vegetation, and existing construction activities associated with Playa Vista First Phase development. (Photo Nos. 2 and 3 on Figure 99 on page 1152.) When construction is completed, the land immediately adjacent to the east and west of the Proposed Project site will be developed as part of Playa Vista First Phase Project. Buildings currently under construction to the west of the Proposed Project site are shown in Photo Nos. 11 and 12 on Figure 101 on page 1157. Development to the west of the Proposed Project site will include predominantly residential uses, with some mixed uses, in mid-rise buildings. Existing and proposed buildings range from two to six stories. Most are approximately four stories. However, some taller building could occur on undeveloped parcels under the allowable height limits. The tallest height limits occur Lincoln Boulevard and allow for buildings up to 126 feet AMSL (approximately 110 feet above grade level).

Land immediately to the east of the Proposed Project site is approved for office and commercial uses, including entertainment, media and technology uses. The land is currently vacant in some locations, and developed with former plant site buildings in other locations. (Photo 13 on Figure 101 on page 1157.) The vacant land is in a degraded state. Eleven former plant site buildings remain within the Playa Vista First Phase Project site. These buildings are to be preserved as components of the Hughes Industrial Historic District, and to serve the proposed uses. Buildings range in height from 32 feet to 90 feet AMSL.

Residential uses in the vicinity of the Proposed Project site display a wide range of development patterns in terms of land use density and style. The residential patterns range from multi-story apartment buildings and/or condominium buildings to single-family homes, with an assortment of multi-family uses in between. (Photos 8, 9, 11 and 12 on Figure 101 on page 1157.)

Bluff-top development to the south of the Proposed Project site includes single-family residential units lying within the community of Westchester. Units within this area are typically single story, single-family units, with apartment buildings along major thoroughfares. Other residential uses adjacent to the Proposed Project include three apartment buildings along

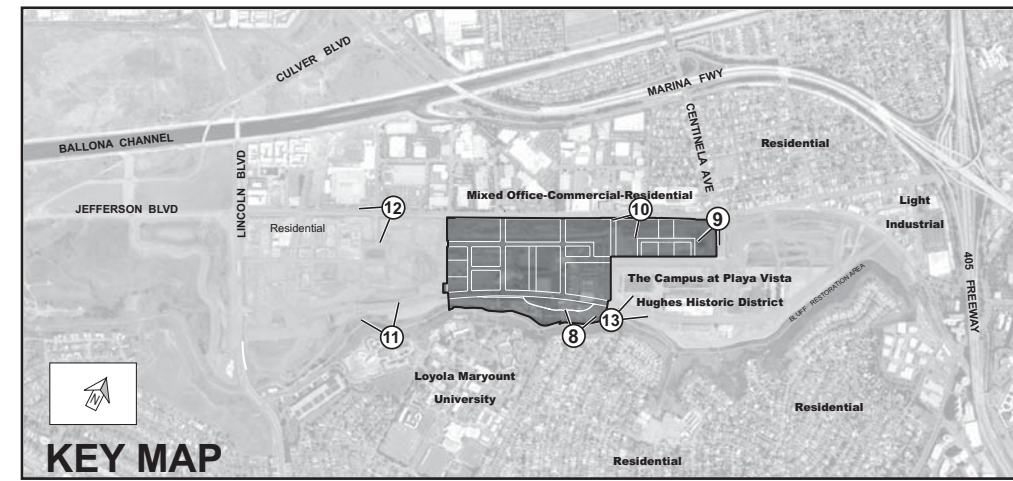
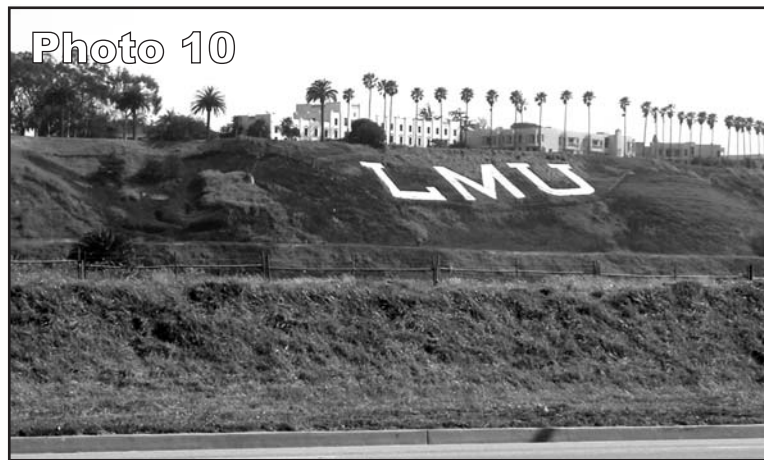




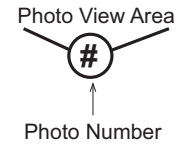
**NORTH:** Jefferson Boulevard - Mixed Use



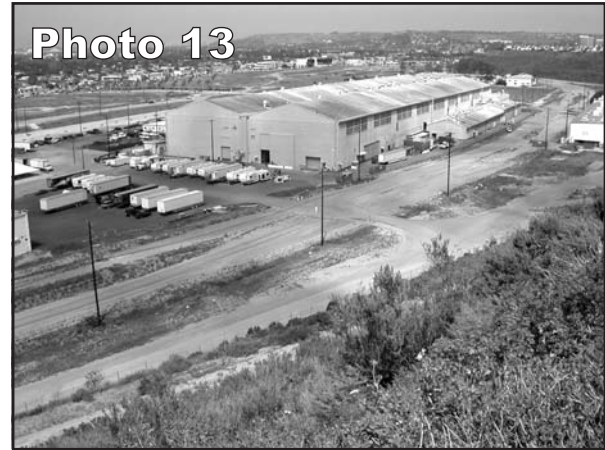
**SOUTH:** Top of Bluff - Residential; LMU



**KEY MAP**



**WEST:** Adjacent Playa Vista First Phase: Mixed Use



**EAST:** Adjacent Playa Vista First Phase: Former Plant Site.



**Figure 101**  
**Character of Surrounding Areas**

SOURCE: PCR Services Corporation, July 2003

Jefferson Boulevard, west of Centinela Avenue, which are three stories tall, and the single family residential community of Del Rey to the northeast of the Proposed Project site.

The residential neighborhoods beyond the immediate vicinity of the Proposed Project site contain buildings which are typically one, two, or three stories in height with four story buildings occurring along some corridors. These neighborhoods blend into further outlying neighborhoods of similar scale, to form a backdrop of Southern California residential communities, punctuated by intermittent centers of more intense development. The more outlying areas contribute to the character of the area as seen from the bluff locations, but otherwise do not generally fall within the view corridors in which the Proposed development is also present; or are at such a distance, that the Project site comprises a minimal component of the particular view.

Also, to the south of the Proposed Project, Loyola Marymount maintains a very visible presence above the bluffs. (Photo 10 on Figure 101 on page 1157.) It offers a campus-type appearance with buildings of various size distributed across the top of the bluffs.

Other uses adjacent to the Proposed Project site are located along Jefferson Boulevard north of the Project site. This area contains mixed-uses, including office, commercial and light industrial uses. (Photo 10 on Figure 101 on page 1157.) Light industrial buildings are located further north of the Jefferson Boulevard mixed uses. Development in these areas include some taller single-story warehouse type buildings and mid-rise (four- to five-story) office buildings.

#### **2.2.4 View Locations**

Views of the Proposed Project site from any specific location are typically limited by the site's pocketed nature within a developed area, the limited orientation of view locations, and intervening features. The greatest view expanse of the site is afforded along the top of the Westchester bluffs to the south of the Proposed Project site. Views of the site are also readily apparent for travelers along Jefferson Boulevard. The Proposed Project site is not located along any designated scenic highways.

The views from various areas around the Proposed Project site are discussed in more detail below, under the following headings: Adjacent Bluff Tops, Adjacent Flatlands, and Public Thoroughfares.

##### **2.2.4.1 Adjacent Bluff Tops**

Existing viewing opportunities from development surrounding the Proposed Project site are primarily created by changes in elevation between the Project site and the Westchester bluffs. These bluffs rise approximately 120 feet above the site (at an average height of 140 feet AMSL) providing panoramic views of the Project site as well as distant views of Marina del Rey, Santa Monica Bay, and surrounding cityscape, and the Santa Monica Mountains, approximately ten miles to the north.

South of the Project site, viewing opportunities for occupants in the single-family neighborhoods and Loyola Marymount University generally include views of the Proposed Project site, the Playa Vista First Phase Project site, the cityscape and the Santa Monica Mountains (Photo Nos. 1-3 in Figure 99 on page 1152 and Photo No. 4 on Figure 100 on page 1153).

#### **2.2.4.2. Adjacent Flatland Development**

Residential and commercial developments located in the flatland below the bluffs offer more limited viewing opportunities. Views from these areas are limited due to their lower elevations, orientation of buildings and intervening development.

The best views of the site occur in the mixed-use buildings across from the Proposed Project site. Generally, the views from the light industrial, commercial and apartment buildings along Jefferson Boulevard north of the site consist of views of the bluffs. Views of the site itself are available from higher floors of some of those buildings (the apartment buildings are three-stories in height). (Photo No. 6 in Figure 100 on page 1153, and Photo 10 on Figure 101 on page 1157.) Views over the Proposed Project site toward the bluffs are also apparent from some taller buildings in the larger community further north of the Project site. These views are limited: they occur at a few private locations, they occur from a considerable distance, and they comprise a very small arc of the overall view from those locations.

#### **2.2.4.3 Public Thoroughfares**

Jefferson Boulevard, which lies adjacent to the north side of the Proposed Project site in an east-west direction, provides views over the Project site to the south. Views include the previously approved Playa Vista First Phase Project site and the bluffs that form the backdrop to the southern views from Jefferson Boulevard (Photo Nos. 5, 6, and 7 in Figure 100 on page 1153). Immediately adjacent to Jefferson Boulevard, the view is affected by graded slopes along the northern edge of the Project site.

Otherwise, views from thoroughfares in the vicinity are extremely limited. It is possible to see the Proposed Project site, or at least over the site, from some spots along Lincoln Boulevard, Culver Boulevard and the Marina Freeway. Due to orientation, and intervening development and landscaping, such views occur as slivers within larger view panoramas, and lie outside of the normal forward view of travelers.



### **3.0 IMPACT ANALYSIS**

#### **3.1 Methodology**

##### **3.1.1 Aesthetics**

The analysis of aesthetics is based on a three-step process as follows:

Step 1: Describe the massing and general configuration of buildings, open space and proposed landscaping treatments around the Project edges, which may be anticipated on the basis of the Project's design features.

Step 2: Compare the resulting appearance to the existing site appearance and character of adjacent uses and determine whether and/or to what extent a degrading of the visual character of the area could occur (considering factors such as changes in the appearance of natural features and open space, and the blending/contrasting of new and existing buildings given uses, density, height, bulk, setbacks, signage, etc.); and

Step 3: Compare the anticipated appearance to standards within existing plans and policies which are applicable to the Project site (regulatory analysis).

##### **3.1.2 Views**

The analysis of views combines the delineation of existing view resources and view locations with the distribution of proposed development on the Proposed Project site and the applicable height limits for each developable lot (Subsection 3.3, Project Design Features, below). These elements were related and evaluated to determine whether views of existing resources would be altered, and whether the sight of a particular view resource (e.g., the ocean, bluffs, etc.) would be obstructed. Alterations within the view setting were compared to the existing view conditions. The analysis further considered whether there were new Project features which would enhance viewing conditions through the creation of new resources or new view locations, and whether the Project included design features which would off-set or mitigate specific impacts.

To determine whether a potentially significant view impact would occur, a three-step process was used to weigh several considerations, as follows:

Step 1: Identify the potential obstruction of view resources (attractive visual features) as a result of development on the Proposed Project site. An assumption was made that any obstruction of a resource would constitute a change in the environment and would be considered an adverse impact regardless of effect on the overall view.

Step 2: Evaluate whether a potential obstruction would substantially alter the view. The “Substantiality” of an alteration in viewing is somewhat subjective and dependent on many factors. In this case an obstruction in the view of a particular view resource was considered substantial if it exhibited the following traits: (1) the area viewed contains a valued view resource; (2) the obstruction of the resource covers more than an incidental/small portion of the resource; and (3) the obstruction would occur along a public view area, or would affect more than a small number of private locations. Where these factors were clearly present, or could be reasonably argued to be present, the impact was considered substantial.

Step 3: Consider whether the Project includes design features which off-set the alteration in views or lost sights of particular view resources which do occur. To be considered as a mitigating factor for a particular adverse view impact, a design feature would need to lessen Project impact for viewers of the specific view which was adversely affected.

The analysis was based on field surveys, photo interpretation, evaluation of mapped information regarding the distribution of uses and view resources, the preparation of five cross-sections along lines which pass over proposed development that would lie between selected view locations and view resources, and the preparation of one elevation view looking south toward the Westchester Bluffs from locations along Jefferson Boulevard.

The potential building development shown on the cross-sections and elevation represents building envelopes in which development could occur given the height limits across the Project site. This analysis assumes that the allowable maximum size for buildings on each individual lot would be built, and thus identifies the maximum view obstruction impacts which might occur to any particular view.

However, due to limitations on the overall amount of development permitted and lot coverage restrictions, the amount of development which could actually occur over the entire site would occupy far less volume than that indicated by the building envelopes shown. Thus, the overall Project impacts are overstated by the methodology in order to address potential development within all possible building envelopes.

### **3.2 Significance Thresholds**

#### **Aesthetics**

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p.L.1-3), the determination of significance for Aesthetics shall be made on a case-by-case basis, considering the following factors:



- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which a proposed zone change would result in building that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

Based on these factors, the Proposed Project would have a significant impact on aesthetics, if:

- The Proposed Project would substantially alter, degrade or eliminate the existing visual character of the area, including valued existing features, natural open space or other valued resources;
- The Proposed Project features would substantially contrast with the visual character of the surrounding area and its valued aesthetic image; or
- The implementation of the Project would preclude the attainment of existing aesthetics regulations.

### **Views**

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p.L.1-3), the determination of significance for Obstruction of Views shall be made on a case-by-case basis, considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);

- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

Based on these factors, the Proposed Project would have a significant impact on views, if:

- Project development would substantially obstruct an existing view of a valued view resource from a prominent view location.

### 3.3 Project Design Features

#### 3.3.1 Urban Development Component

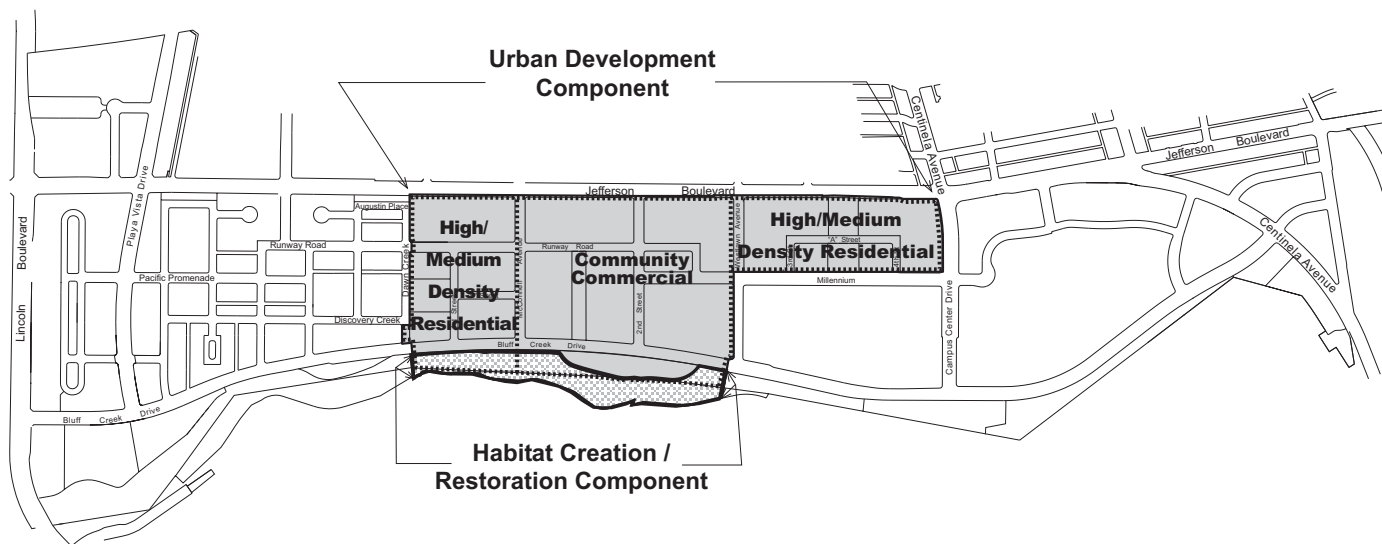
##### 3.3.1.1 Land Use

The Project's appearance would be shaped, in part, by the uses that would occur on the Project site. The proposed development in the Project's Urban Development Component would include a planned, mixed-use community containing a diverse range of commercial, residential, recreational, public and open space uses. The Proposed Project's Development Plan includes land use designations, a land use program that specifies allowable uses, and development standards that would guide and shape the Projects' physical form. The General/Community Plan and Zoning designations that are proposed are illustrated in Figure 102 on page 1164. The Project's Urban Development Component includes a series of residential neighborhoods organized around a Village Center. The Village Center is envisioned as an area defined by mixed-use development centered on a public plaza that may include ground floor retail uses with additional retail, office and/or residential uses located above. Development would include the following:

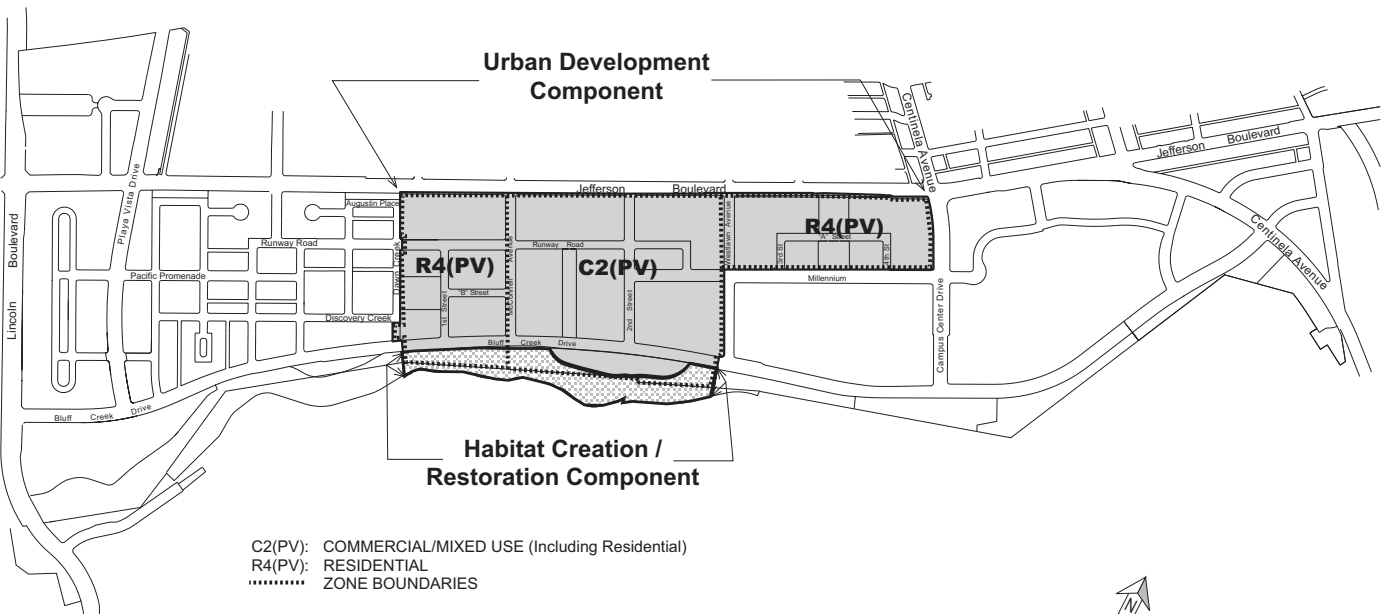
**Urban Development:** The total amount of development includes up to 2,600 dwelling units, 175,000 sq.ft. of office use, 150,000 sq.ft. of retail uses, and 40,000 sq.ft. of community-serving uses. The amount of development allowed is discussed in detail in the Project Description, and in the Land Use Section of the EIR.

**Community/Neighborhood Parks:** A total of 11.4 acres of park space is provided at several locations throughout the Project site. In addition to providing recreational opportunity, these features would act as organizing elements within the Project site and provide open space and landscaping at several locations.

## Proposed General Plan Designations



## Proposed Specific Plan/Zoning Designations



**NOTE:**  
 Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



Figure 102  
**Proposed Plan Amendments**

Source: Playa Capital Company, July 2003

**Private Open Space:** Additional open space would occur throughout the Proposed Project within each development parcel. A variety of private and semi-private uses have been proposed for these open space areas, including courtyards, gardens, plazas and landscaped buffer areas. While these areas would not necessarily be accessible to the general public, they would affect the overall aesthetic character of the Project by causing articulation in building profiles and increasing the amount of landscaping on the site.

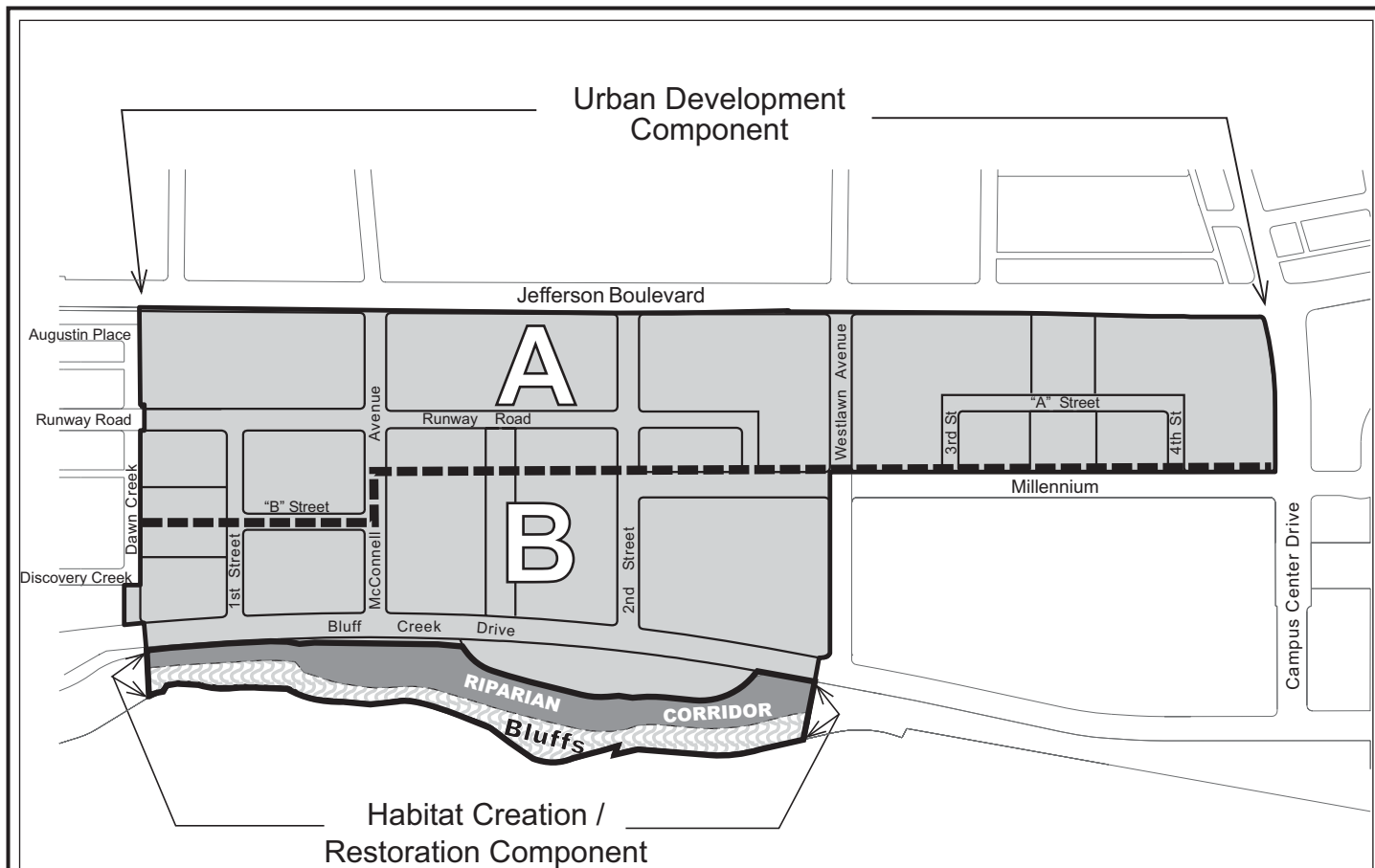
### 3.3.1.2 Development Standards

#### 3.3.1.2.1 Building Height and Massing

Proposed Project development would be subject to numerous development standards regarding the location and massing of buildings. The shapes of the building envelopes in which development could occur would be limited by restrictions on building heights, on developable floor area as a percentage of lot area and minimum setbacks. The proposed height limit designations for the site are shown in Figure 103 on page 1166. The height limits are expressed in feet AMSL. By expressing these limits in terms of elevation rather than height above ground, direct comparisons can be made to the elevations associated with the various visual vantage points outside of the Proposed Area, such as the Westchester Bluffs. For descriptive purposes, building heights, as expressed in feet above sea level, are correlated to building heights above ground level in the legend for Figure 103.<sup>530</sup>

- The Project further restricts the massing of development by placing limits on the percentage of total lot area which may be developed. The limitations on floor area varies according to land uses, as follows: Residential Lots: The maximum lot coverage would be 55 percent;
- Commercial and Mixed Use Lots: The maximum lot coverage would be 60 percent; and
- Park Sites: The maximum lot coverage would be 25 percent (e.g., recreational and park facilities)

<sup>530</sup> *The Project's building height envelopes are inclusive of all functional roof top appurtenances. This includes parapets, pitched roofs, chimney, vent stacks, antennas, radar microwave or television dishes, aircraft warning lights, lightning protection, elevator penthouses, stairwell enclosures, mechanical equipment, skylights, roof decks, helipads and other functional elements. One ornamental architectural feature (such as a belvedere, cupola, steeple or spire, flags, ornamental tower, clock and bell tower or weather vane) may exceed the established height limits, provided: (1) it is no more than 625 sq.ft., (2) has no plan dimension greater than 25 feet, and (3) does not exceed the maximum height envelope by more than 30 feet. Within the maximum height envelope and regardless of the style of the roof, all roof top equipment will be properly screened from the view of adjacent structures within the Proposed Project and adjacent Playa Vista First Phase Project. Wherever feasible, efforts would be made to screen the equipment from the view of the Westchester Bluffs.*



**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
<b>A</b>	95'	68' - 72'	71' - 88'
<b>B</b>	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL. Westchester Bluffs: Approximately 140' AMSL

Urban Development Component  
 Habitat Creation / Restoration Component

0      400      800 Feet

**Figure 103  
Proposed Height Limits**

Source: PCR Services Corporation, July 2003

Height limits are higher along the southern edge of the Project's site, although well below the top of the bluffs, and lower along the northern edge of the site, diminishing with distance from the bluffs, creating a tiered effect.

#### **3.3.1.2.2 Building Setbacks**

The Proposed Project also includes design standards that pertain to the portions of individual development sites within which development can occur. This is accomplished by establishing roadway and side-lot setback areas. The proposed setback standards are shown in Table 182 on page 1168.

#### **3.3.1.2.3 Signage**

The Proposed Project also includes design standards intended to establish an on-site signage program that reflects the character and nature of the development envisioned to occur. These standards are based on Los Angeles Municipal Code requirements. The proposed signage standards will focus on the unique attributes of the Village Center as well as the need for directional signage and the permitting of signage within residential setback areas subject to a prescribed set of principles.

#### **3.3.1.2.4 Site Elevations**

The Proposed development scheme makes extensive use of buildings over subterranean parking. Accordingly, ground level for building entrances will be on development pads which are raised from surrounding grade levels, and which will continue to be raised above the existing thoroughfares along the edges of the Project site. Roughly, existing elevations ranging from 7 feet to 24 feet AMSL would be increased to elevations in the general range of 23 feet to 27 feet AMSL.

At many locations, raised building pads would be sloped downward along the development edges creating a landscaped slope facing passers-by. Along Jefferson Boulevard, the only existing public thoroughfare adjacent to the Project site, the slope would raise to as much as 10 feet to 11 feet above grade, thus dominating the visual character along that roadway. The new slope would be about 5 feet to 6 feet higher than the existing slope along Jefferson Boulevard.

#### **3.3.1.2.5 Design and Landscaping Concepts**

The Proposed Project includes a landscaping program that shapes the character of future on-site development, and provides continuity throughout the Project site. Major features of the proposed landscaping program include the following:

Table 182

## PROPOSED SETBACK REQUIREMENTS

Location	Required Setback
<u>Thoroughfares</u>	
Jefferson Boulevard	15 Feet (From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet
Runway Road (Dawn Creek to McConnell)	15 Feet
Runway Road (McConnell to 2nd Street)	0-5 Feet (Street front retail will characterize this block.)
Runway Road (2nd Street to Millennium)	15 Feet north side; 10 Feet south side
Millennium Road	15 Feet
McConnell Avenue	10 Feet
McConnell Avenue (100 feet north and south of Runway Road)	0-5 Feet (Street front retail will characterize this block.)
Westlawn Avenue	10 Feet
Campus Center Drive	15 Feet
1st, 2nd, 3rd, and 4th Street	10 Feet
2nd Street (100 feet north and south of Runway Road)	0-5 Feet (Street front retail will characterize this block.)
A and B Streets	10 Feet
Dawn Creek	10 Feet
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>	
Adjacent to a Residential or Commercial Lot	10 Feet
Adjacent to a Park or Open Space Lot	5 Feet

<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2003.

**Jefferson Boulevard:** Generally, the area adjacent to the Jefferson Boulevard would include a 5-foot wide parkway, a 5-foot wide concrete public sidewalk, and a planted slope, with intermittent retaining walls rising to the building pads above the roadways. The Jefferson Boulevard parkway would be landscaped with Canary Island Pines as the dominant tree species, planted 40 feet on center, and ground cover. The sloped area would be planted with shrubs and ground cover.

**Interior Roadways:** Individual streets or small groups of adjacent streets would have a distinguishing tree type. Like the street tree plantings found in older Los Angeles neighborhoods, the tree types would vary, and would likely include, but are not limited to the following: *Washingtonia robusta*, *Ulmus parvifolia*, *Tipuana tipu*, *Pinus canariensis*, *Magnolia grandiflora*, *Liquidambar styraciflua*, *Koelreuteria bipinnata*, *Jacaranda mimosifolia*, *Erythrina caffra*, *Cupressus sempervirens*, *Cedrus deodora*, *Arecastrum romanzoffianum*, and *Albizia julibrissin*. Parkway areas would also include a variety of ground covers, including turf.

**Parks and Open Space:** These areas would typically include clustered shade trees, walkways, and open lawn areas. Most of the parks would include park furnishings such as benches, tables and chairs. Other features proposed for many of the parks include small structures such as band shells, kiosks, or fountains. The open space areas along the southern edge of Bluff Creek Drive, would include landscaping selected to provide a transition between the native landscaping of the adjacent riparian corridor, and the plant species found in the urban neighborhoods north of Bluff Creek Drive.

#### **3.3.1.2.6 Project Appearance**

The Proposed Project would allocate development to the Project site in accord with the various restrictions and design standards noted in the previous section. The expected appearance of the resulting development is illustrated in Figure 104 on page 1170.

#### **3.3.2 Habitat Creation/Restoration Component**

The Project's Habitat Creation/Restoration Component includes the construction of a 6.7-acre Riparian Corridor and the restoration and maintenance of a five-acre portion of the Westchester Bluffs, located to the south of the Riparian Corridor.

The proposed Riparian Corridor would include habitat such as emergent, willow scrub woodlands and mixed riparian woodlands, as well as native grasslands. The construction of this Project component would complete a 25-acre riparian corridor that also includes sections east and west of the proposed Riparian Corridor, ultimately feeding into the Playa Vista First Phase Freshwater Marsh (west of Lincoln Boulevard and south of Jefferson Boulevard), thus establishing a 51-acre Freshwater Wetland System. The proposed bluff restoration program would enhance the bluffs as a coastal sage scrub community with increased habitat value.

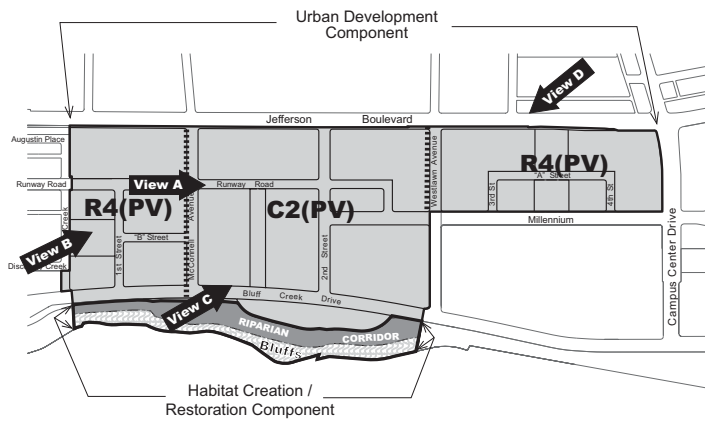
### **3.4 Project Impacts**

The Project's Urban Development Component would alter the appearance of the Project site with the development of a mixed-use community. The Habitat Creation/Restoration component of the Proposed Project would create habitat and enhance the habitat value of the site, and in so doing add vegetation and a more natural appearance to the site. These contributions would be a beneficial impact on the environment. The two Project components together would contribute to the overall appearance of the Project. As such the following discussion pertains to the Project as a whole.

#### **3.4.1 Aesthetic Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies seven factors to be used for determining the significance of a project's impacts on aesthetics (See Subsection 3.2 above). The first two factors refer to changes in the character of an area from its existing conditions and



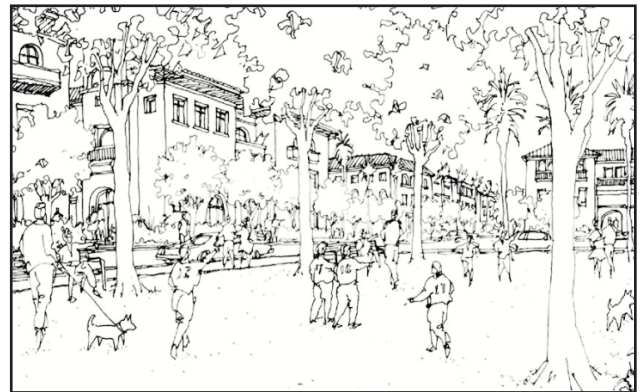


**LEGEND**

**C2 (PV)** Commercial/Mixed Use  
**R4 (PV)** Residential  
 ..... Zone Boundaries



**View A:** Runway Road Looking East



**View B:** Park



**View C:** Bluff Creek Drive



**View D:** Jefferson Boulevard



**Figure 104**  
**Representative Illustrations**  
**of Project Appearance**

Source: PCR Services Corporation

have been combined into the first significance threshold that addresses impacts on valued resources. The next four factors are all contributors to the relationship between new development (i.e. project design/site integration, image, density, height, bulk, setbacks, signage, etc) and existing development. These factors have been combined in the second significance threshold that addresses impacts on the visual character of the surrounding area. The seventh factor has been incorporated directly into the third significance threshold that addresses impacts regarding the regulatory setting.

#### **3.4.1.1 Impacts on Valued Resources**

The Proposed Project's Urban Development Component includes 99.3 acres of mostly undeveloped area in a somewhat degraded/unnatural state within an area of urban development. This undeveloped land has resource value as it provides relief from urban development for local residents and travelers along Jefferson Boulevard, and offers a view of the Westchester Bluffs from certain vantage points.

Development of the Proposed Project would place urban development within large portions of the Proposed Project site. It would alter the current undeveloped appearance of the site to one of urban development. This would be a substantial alteration of the visual character of the Proposed Project site and a significant impact prior to mitigation.

#### **3.4.1.2 Impacts on Visual Character of the Surrounding Area**

The Proposed Project site currently has an altered, and somewhat degraded appearance. The site is currently used as a staging area for construction equipment, storing soil and as temporary detention basin used in developing the Playa Vista First Phase Project. As depicted in Photo No. 2 and Photo No. 3 in Figure 99 on page 1152, and Photo No. 4 in Figure 100 on page 1153, much of the Project site lacks vegetation or other aesthetic treatments and is currently in a visually degraded state.

Descriptions of Proposed Project development are included in Section 3.3, above, and representative sketches of potential buildings are presented in Figure 104 on page 1170. The resulting appearance of the Project for local residents and travelers north of the area would be shaped by the Project features facing Jefferson Boulevard. These include the predominantly residential, although in some cases mixed uses which could be up to 95 feet AMSL (approximately 68 to 72 feet above finished grade). The appearance of the Project site from Jefferson Boulevard would be shaped by the vegetated parkway and adjacent slopes with intermittent retaining walls lying beyond the parkway, and the landscaped edge of development and setbacks atop the slopes. Development along Jefferson Boulevard could be taller than some of the existing uses on that corridor, but would still be mid-rise in nature, and would have impacts which are softened by the landscape buffering of buildings. The Project would replace the existing, degraded vegetation and disturbed appearance of the Project site, with new landscaping and development. Therefore, the Proposed Project would result in a less-than-

significant impact as it would not contrast substantially with neighboring development along Jefferson Boulevard, nor cause a degradation of the developed character of the area.

The Project height limits designated for the southern edge of the Proposed Project site are restricted to a level well below the edge of the bluffs (with heights up to 112 feet AMSL versus the 140 foot (AMSL) heights along the top of the bluffs) and would not alter the character of the residential or University uses atop the bluffs. Areas adjacent to the Proposed Project site on the east and west include lands approved for development and partially developed, with residential development under construction further west, and the existing light industrial uses to the east of the Proposed Project site. These areas are being developed with Playa Vista First Phase mixed use development to the west and the Campus at Playa Vista to the east. Residents atop the bluffs would see an in-fill development, punctuated by open space, blending with surrounding uses.

The aesthetic impacts of the proposed development would be lessened by the following: (1) the height limits and lot coverage restrictions; (2) landscaping throughout the public and private open space areas; (3) the park areas distributed throughout the Project site; (4) restored bluff faces; and (5) an open space area at the foot of the bluffs, which would be improved and integrated visually with the adjacent, First Phase riparian corridor. The bluffs and riparian corridor within the Proposed Project's Habitat Creation/Restoration component would add an important aesthetic amenity to the area which would be visible from portions of the bluff edge and to travelers along Bluff Creek Drive (formerly known as Teale Street).

The various Project Design Features described above would result in a less-than-significant impact as they would address existing degraded conditions on the site, and would not contrast with the visual character of the surrounding development so as to cause a degradation of the environment.

Construction Impacts: Development of the Proposed Project would also cause changes in the aesthetic conditions of the Project site during the time of construction. Construction would occur over several years. Activities would include grading of the site, provision of infrastructure/streets, the sequential addition of buildings and finally the provision of landscaping and other aesthetic treatments.

The Proposed Project site currently has an altered, and somewhat degraded appearance. The site is currently used as a staging area for construction equipment, storing soil and as temporary detention basin used in developing the Playa Vista First Phase Project. As depicted in Photo No. 2 and Photo No. 3 in Figure 99 on page 1152, and Photo No. 4 in Figure 100 on page 1153, much of the Project site lacks vegetation or other aesthetic treatments and is currently in a visually degraded state.

During Proposed Project development, the site's current construction-like appearance would be expanded. Construction activities related to Project development would bring heavy equipment (in addition to the staged equipment that currently occupy the Project site) and

construction workers to the Project site to engage in typical construction activities (e.g., earth movement, materials delivery, building construction, etc.).

As buildings begin to rise on the site, its appearance would change in an incremental fashion from one of openness to the one associated with full buildout of the area. At various times, the site would contain buildings in various stages of development, at various locations. Completed buildings would add, incrementally, to the total buildout effect described above.

Accordingly, construction impacts would cause an alteration in the site's aesthetic conditions. These impacts would be of a temporary and unavoidable nature, and would be typical of aesthetic impacts caused by construction of other projects. Views of the Project site from the top of the bluffs are limited as most of these viewing locations extend to the farther range view over the Project site. Those viewers who step to edge of the bluffs will see the construction activity as part of the general urban scene. Impacts on travelers along Jefferson Boulevard, the only existing public thoroughfare adjacent to the Project site, would be limited, as construction would occur atop the berms (up to approximately 10 to 11 feet above existing grade.) Further, potential impacts on aesthetics along the Project edge on Jefferson Boulevard would be reduced by the proposed placement of fencing/visual screening along construction edges. As these factors lessen the potential aesthetics impacts from construction, and as the site is currently in a somewhat degraded condition, with evidence of construction activity, the construction impacts would not cause a substantial alteration in site contrast and are considered less than significant.

#### **3.4.1.3 Impacts Regarding the Regulatory Setting**

The Proposed Project includes design standards that would be implemented through amendments to the Area D Specific Plan and as Conditions of Approval to the Project's Tract Map. The Applicant proposes to establish design criteria that are comparable to the existing standards.

Many of these criteria, those pertaining to height/massing/setbacks, signage and landscaping, are included in the Project Design Features (Subsection 3.3 on page 1163). The aesthetics analysis above discusses the relationship between proposed development and surrounding uses. As indicated there, new development would be similar to and aesthetically compatible with adjacent development. Project edges include numerous design features to reduce potential impacts on adjacent uses.

Additional standards are proposed to address such items as building materials, screening of mechanical equipment, etc., within the Proposed Project areas. The design requirements of the Area D Specific Plan pertains to design characteristics which are applicable to the design of individual building projects and which can be implemented during the plan check stage in the development review process. Specific plan requirements would be implemented during plot plan review. Therefore, implementation of the Project would result in a less-than-significant impact

with regard to the regulatory framework as it would not preclude the attainment of existing aesthetic regulations.

### **3.4.2 View Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies four factors to be used for determining the significance of a project's impacts on the obstruction of views (See Subsection 3.2 above). Three of the four factors describe the analysis components considered in determining the extent of view obstruction and have been incorporated into the methodology used to assess impacts. The first factor is incorporated into the analysis' definition of view resources; the second and fourth factors have been incorporated in the analysis' definition of "view locations;" and the third factor directly addresses the extent of potential impact.

#### **3.4.2.1 General View Impacts and Representative View Sections**

The nature of the impacts that could occur with development of the Proposed Project would vary depending on the location from which a viewer is looking, the nature of view resources within one's line of view, the occurrence or lack of intervening buildings, and the characteristics of new project development. Photographs showing the existing view conditions were taken from locations around the Playa Vista site, as represented in Figure 98 on page 1151. The photos are included in Figure 99 on page 1152 and Figure 100 on page 1153.

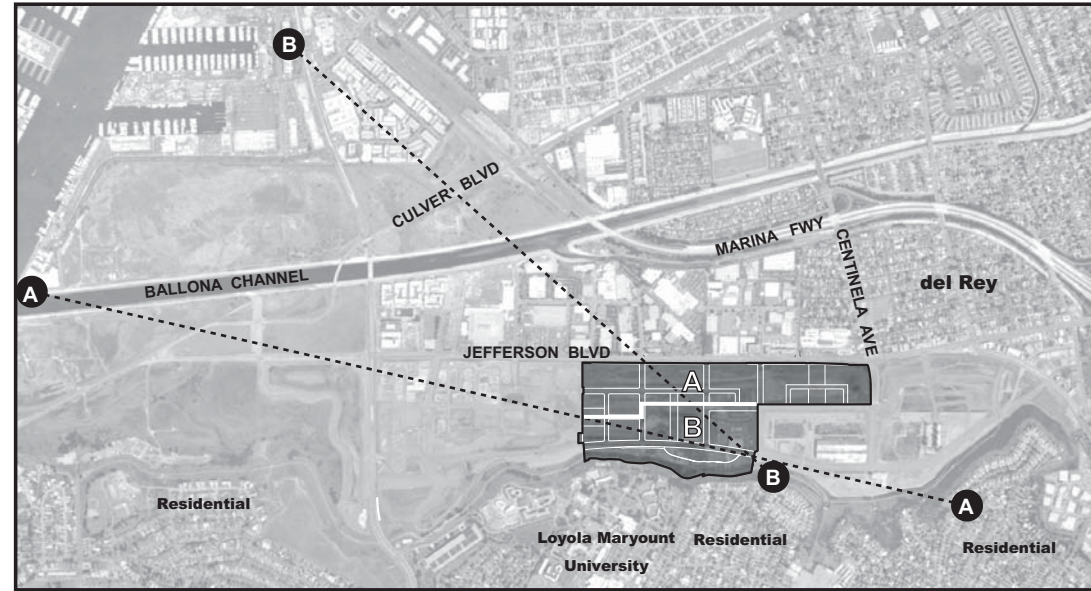
In order to identify the relationship of these elements as they occur in the areas surrounding the Proposed Project, and how they affect viewing conditions, five cross-sections of the area and one elevation view were generated. The graphic representations and their locations are presented in Figure 105 on page 1175 and Figure 106 on page 1176. The cross-sections represent views along lines passing through designated development areas from representative viewing locations around the site. The elevation presents a view looking toward the Westchester bluffs.

As described in Section 2.0, Environmental Setting, above, the most notable views of the Proposed Project site occur from the bluff top south of the site, and from private and public locations along Jefferson Boulevard to the north of the site. Otherwise, views are limited due to intervening development, poor viewing orientations and long distances to view locations. Accordingly, the following view discussion is segmented into the following three view locations with similar viewing conditions: (1) Bluff Tops (Westchester Bluffs south of the Project site), (2) Flatlands (Private Locations along Jefferson Boulevard), and (3) Thoroughfares (Public Views along Jefferson Boulevard).

#### **3.4.2.2 Views from the Westchester Bluffs**

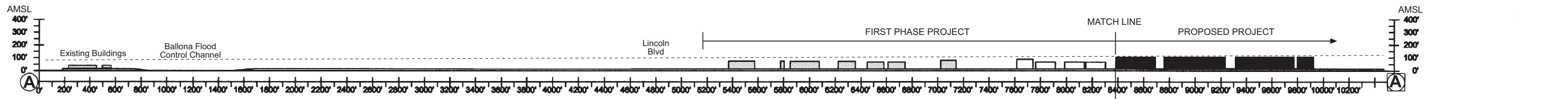
**General View Conditions.** Locations along the top of the bluffs south of the Proposed Project site generally have panoramic views which, depending on their orientation, include some

**KEY MAP**

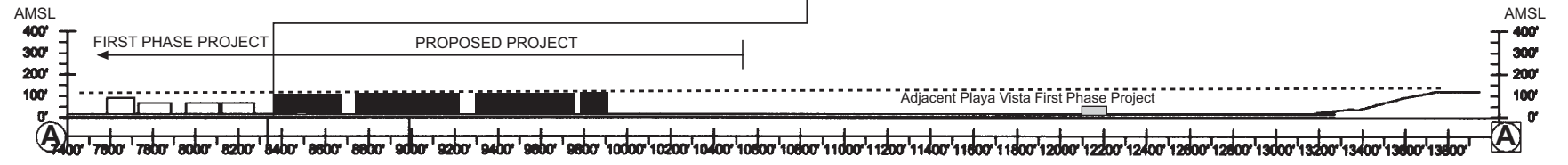


**LEGEND**

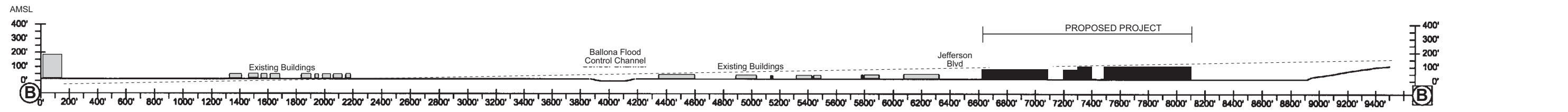
- Building Envelope Proposed Project
- Building Envelope Adjacent Playa Vista First Phase Development
- Existing Buildings
- View Line Over Top of Buildings



**SECTION A**



**SECTION A (CONT.)**



**SECTION B**

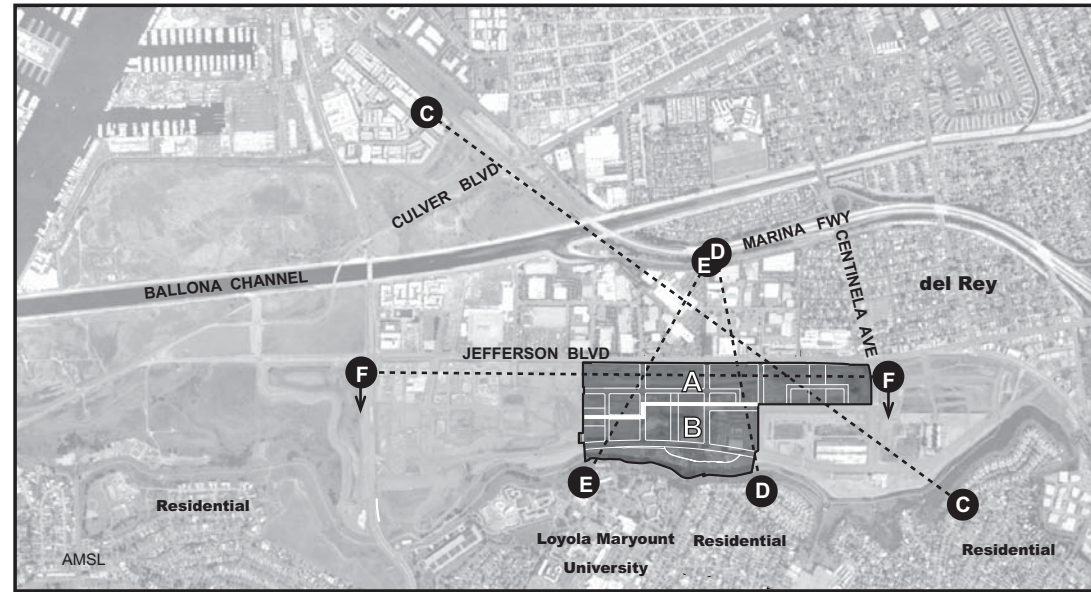


Figure 105  
View Sections  
Viewlines A&B

SOURCE: PCR Services Corporation, July 2003

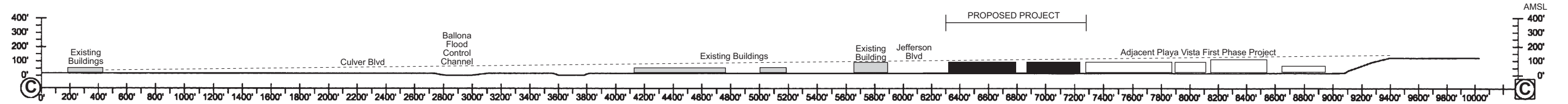


# KEY MAP

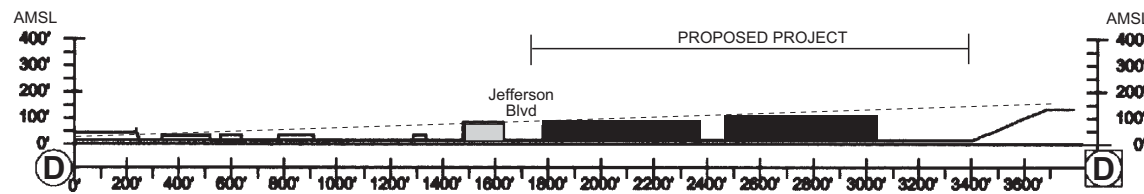


## LEGEND

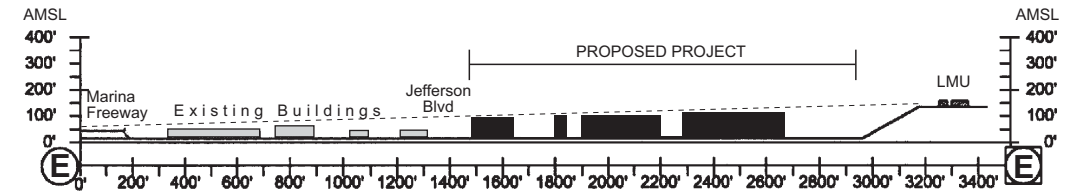
- Building Envelope Proposed Project
- Building Envelope Adjacent Playa Vista First Phase Development
- Existing Buildings
- View Line Over Top of Buildings



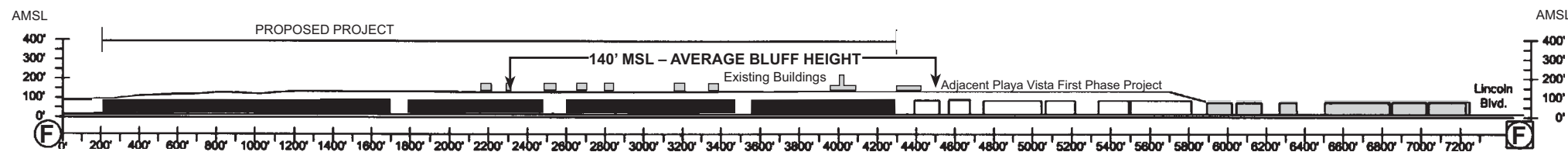
**SECTION C**



**SECTION D**



**SECTION E**



**SECTION F - BLUFF ELEVATION VIEW**



Figure 106  
View Sections  
Viewlines C-F

SOURCE: PCR Services Corporation, July 2003

or all portions of the Proposed Project, Playa Vista First Phase Project, Pacific Ocean, cityscape and Santa Monica Mountains.

**Views to the North and Northwest.** Views over the Proposed Project site are reflected in Photos 1, 2, and 3 on Figure 99 on page 1152 and Photo 4 on Figure 100 on page 1153. The impacts on views to the north and northwest are reflected in Sections B, C, D, and E on Figure 105 and Figure 106 on pages 1175 and 1176. As indicated, new development would be well below the edge of the bluffs. Existing mid-range and long-range views of the Marina Freeway area and cityscape beyond would remain.

Close range views of the Project site from locations along the edge of the bluffs would change from an undeveloped to a developed character. The tops of the tallest allowable Project buildings in this area would tend to blend with the existing buildings in the light industrial area north of Jefferson Boulevard, and with the trees alongside of the Marina Freeway. It is expected that the inclusion of open space within developed areas, and the required stepped building profiles for taller buildings would provide some interest and variation for the site as a viewable area, and thus somewhat lessen the close-range impact of altering the site. The new development would also have the effect of extending the edge of the cityscape to the foot of the bluffs.

**Views to the West.** Current views toward the west are shown in Photo 1 on Figure 99 on page 1152. Potential impacts on views toward the Santa Monica Bay are illustrated in View Section A on Figure 105 on page 1175. Impacts on these views would be minimal. Impacts could only occur from the most easterly portion of the Westchester Bluffs (Photo Location No. 1). From this location, the tallest allowable buildings would fall below the view line of the water areas near the entrance to the Marina del Rey Channel and would tend to blend into existing building tops in the surrounding areas, including the recently developed Playa Vista First Phase buildings. Other locations along the Westchester Bluffs (west of Photo Location 1) would not incur westerly view impacts from Proposed Project development.

**Conclusions Regarding Impacts From the Westchester Bluffs.** Some Proposed Project buildings would be visible from locations along the edge of the Westchester Bluffs. New Proposed Project buildings would alter the undeveloped character of the site between the eastern and western portions of the adjacent Playa Vista First Phase Project, bringing the edge of the cityscape closer to the foot of the bluffs. However, the impacts of these buildings would be considered less than significant as Project development would not substantially obstruct an existing view of a valued view resource from a prominent view location for the following reasons: (1) panoramic views would still be present from all locations along the Westchester Bluffs; and (2) existing view lines toward the ocean would not be affected by proposed development.



### 3.4.2.3 Views from Mixed Use Areas North of the Project Site

**General View Conditions:** Views of the Proposed Project site from most uses north of the Project site are limited due to intervening development. Views of the Proposed Project are limited to the office buildings and apartments directly facing Jefferson Boulevard. See Photo 6 on Figure 100 on page 1153. In many cases these buildings are not oriented in a way to take advantage of the potential views. Some of the buildings have few windows, or are located in the interior of their respective properties. Views which existed in the past were of the site's large stockpiles of fill material, other construction-related activities and remnants of past activity. With implementation of the adjacent First Phase Project, the appearance of the south side of Jefferson Boulevard is undergoing a transformation. Completion of the First Phase Project will create a generally developed appearance along Jefferson Boulevard, with undeveloped land at the center. View impacts would occur only for existing development directly facing the undeveloped land, in which the Proposed Project is located.

**Views Over the Proposed Project Site.** Development in the Proposed Project site would alter views of the existing undeveloped area and bluffs along the southern edge of the Project site. The nature of the new views would vary depending on the elevation of an observer. From ground view along Jefferson Boulevard, the new appearance would be dominated by landscaped parkway and berms interspersed with retaining walls along Jefferson Boulevard; and landscaped buildings along the top of the berm. As one's location moves to the upper stories of buildings facing the site, the view becomes more dominated by proposed buildings and the landscaped open spaces surrounding them. Views of the bluffs would remain available for some sight lines aligning with north-south streets. Sections D and E, on Figure 106 on page 1176, indicate the height relationship between existing buildings, and proposed buildings. Illustration F on Figure 106 provides an elevation of the proposed maximum height limits in relationship to the height of the bluffs.

The impact of views into the Project site would be somewhat softened by the spaces between buildings enforced by the lot coverage restrictions, and the new landscaping. It may also be noted that while some bluff views would be lost from private locations along Jefferson Boulevard, new public views of the bluffs and riparian corridor would be provided along Bluff Creek Drive at the southern edge of the Proposed Project site.

**Conclusions Regarding Impacts from Mixed-Use Areas North of the Project Site.** Even though this area is not a prominent view location, it is nonetheless conservatively concluded that impacts on views from this area would be significant for the following reasons: (1) impacts would occur at more than a few locations; (2) at those locations, the obstruction of views of the bluffs would be substantial; (3) the Westchester Bluffs are an important scenic resource; and (4) the obstruction of views along Jefferson Boulevard is already considered significant due to the roadway's stature as a public (and therefore prominent) viewing area.

### 3.4.2.4 Views from the Jefferson Boulevard Thoroughfare

**General View Conditions.** Both eastbound and westbound travelers have views, which are dominated by the roadway, as framed by the existing slope on the south side of the road, and existing development on the north side of Jefferson Boulevard. Views also scan over the Project site toward the bluffs beyond. Views of the bluffs, a recognized visual resource, currently occur for travelers along a large portion of the stretch of Jefferson Boulevard lying between Lincoln Boulevard and Centinela Avenue. Photos 5 and 7 on Figure 100 on page 1153 represent an angular view of the bluffs for eastbound automobile travelers who look off to the south side of the road.

**Views over the Proposed Project Site.** Development of the Proposed Project would alter the undeveloped character along the south side of Jefferson Boulevard and views of the bluffs beyond. New development would create a developed appearance and obstruct the views of the bluffs for travelers along Jefferson Boulevard, as they approach the Project site from the east and the west. The appearance would be dominated by the landscaped slope with intermittent retaining walls along Jefferson Boulevard, and other vegetated open space and building areas along the top of the slope.

The Proposed Project would also include the establishment of a roadway along the foot of the bluffs (Bluff Creek Drive). Such a road would provide an alternative east-west route for travelers through the area, and offer views of bluffs, open space, and riparian corridor between the road and the bluffs.

**Conclusions Regarding Impacts from Jefferson Boulevard Thoroughfare.** Proposed development would alter existing views of the Westchester Bluffs from Jefferson Boulevard. The Project includes several design features that would lessen the extent of the impact and contribute to the aesthetic quality along this roadway and provide a new view corridor along Bluff Creek Drive. Nonetheless, impacts would be considered significant as Project development would substantially obstruct an existing view of a valued view resource from a prominent view location for the following reasons: (1) views of the Westchester Bluffs would be obstructed for travelers along a segment of Jefferson Boulevard; (2) this view location is a public thoroughfare with a large number of travelers; and (3) the Westchester Bluffs are an important scenic resource.

### 3.4.3 Summary of Visual Impacts

The analysis of Aesthetics has addressed three significance thresholds. With regard to the first aesthetics threshold, it has been concluded that the Proposed Project would substantially alter the character of the Project site. While the area is in a somewhat degraded state, the site provides visual relief in the urban setting and provides views of the bluffs. Therefore, the alteration of the site is considered a significant impact.

With regard to the second aesthetics threshold, it has been concluded that the Proposed Project would be somewhat similar to surrounding uses regarding massing of buildings to the east, west and north, and would be buffered from uses to the south. Further, the Proposed Project would improve the existing degraded site conditions with landscaping and new development. Therefore, the Proposed Project would not substantially contrast with surrounding development, so as to cause a degradation of the environment and the impacts on visual character would be less than significant.

With regard to the third aesthetics threshold, it has been concluded that the new regulations would be comparable to the existing aesthetics regulations, and impacts regarding the regulatory framework would be less than significant.

Based on the threshold for views, it was concluded that Project development would substantially obstruct the views of the bluffs, a view resource, for travelers and private locations along Jefferson Boulevard, north of the Project site. This would be a significant impact at this location. Impacts on views from other locations would not cause a substantial obstruction of an existing view resource, and impacts would be less than significant at other locations.

#### **3.4.4 Equivalency Program Impacts**

The preceding visual quality analysis addressed impacts associated with aesthetics and views. The aesthetics analysis addressed issues related to the alteration of existing valued features, the character of development and regulations pertaining to aesthetics. The views analysis addressed the potential alteration in the views of valued view resources. All of these impacts arise from the location, massing, and materials of development. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Project's Urban Development Component. No changes are proposed under the Equivalency Program to the Project's Habitat Creation/Restoration Component.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations, building pad elevations, height limits, or setback requirements. Any additional retail development would be similar in appearance to other retail development. The assisted living units would be similar to other residential development of similar density.

All Project Design Features (as discussed in Subsection 3.3 above) and/or recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, below) to minimize visual quality impacts under the Proposed Project would be implemented, as appropriate, under the Equivalency Program. Therefore, development under all of the Equivalency Scenarios would have a visual character that is similar to that of the Proposed Project and would be consistent with the visual quality regulations that are applicable to the Proposed Project site, and as with the

Proposed Project would not result in significant impacts regarding these topics. At the same time, as with the Proposed Project, all of the Equivalency scenarios would result in the loss of undeveloped area amidst the visual setting (a valued aesthetic feature) and related loss of views of the bluffs from Jefferson Boulevard. As with the Proposed Project, impacts under all of the Equivalency Scenarios would be significant regarding the loss of undeveloped area and views of the bluffs from Jefferson Boulevard.

### **3.4.5 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue.

These off-site improvements are located in urban developed areas. All of the off-site improvements except the water regulator station occur within or adjacent to existing roadways. The water regulator station would include a small amount of piping equipment that would most likely be located just above ground. The off-site improvements do not involve the construction of any buildings. Therefore, there no impacts on existing views would occur.

However, roadway widening would impact existing landscaping and trees that contribute to the quality of the character of the aesthetic environment. Such impacts would occur at four locations. The most notable effect would occur along the Centinela Corridor that is proposed for roadway widening of six feet on the western side and eight feet on the eastern side between Milton Street and Wagner Street. The existing parkway along this length of the corridor would be reduced in size and approximately 15 trees would be impacted. All of the improvements within the City of Los Angeles would be implemented in accordance with applicable policies and City practices for landscaping and tree planting in conjunction with roadway improvements.

A proposed off-site improvement at the intersection of Centinela Avenue and Culver Boulevard would require a roadway widening of approximately 12 feet, for approximately 250 feet along the north side of South Culver Boulevard. Also, the off-site improvement at the intersection of Culver Boulevard and Inglewood Boulevard would require widening of approximately 12 feet for approximately 250 feet on the east leg of the intersection and approximately 12 feet for approximately 200 feet on the west leg. These widenings would alter the amount of landscaping and trees within the median between North Culver and South Culver Boulevards. The alteration would leave most of the landscaping in place and would allow the median to continue to serve as a visual amenity. Also, the proposed roadway widening at

Overland Avenue and Culver Boulevard would impact a few trees, and a small patch of landscaped area. Other widenings may affect very small landscaped patches.

The design of the roadway improvements includes re-landscaping of affected parkway and median areas and the planting of new trees. The mitigation measures included below require that the development of landscaping plans, commensurate with the extent of the landscaping impacts and tree relocation in proximity to their current locations if space is available, or replaced on a not less than one-to-one basis.

The implementation of the off-site improvements would not substantially alter the visual character of their surrounding areas. There would be no changes in land use, and currently landscaped areas would continue to provide similar landscaping to that which currently exists, albeit in a slightly reduced amount. Therefore, none of the off-site improvements would result in significant impacts unto themselves, nor would they alter the conclusions of impacts regarding the Proposed Project above.

#### **4.0 MITIGATION MEASURES**

##### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to recordation of tract maps, parks/open space, and major open space areas, such as the riparian corridor, and bluffs, shall either be designated as open space on final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.
- All rooftop structures (including mechanical equipment), garbage dumpsters, and other unsightly equipment, shall be screened from views at the adjoining street.
- Open areas not used for streets, walkways, plazas, and other hardscape areas or driveways shall be landscaped. Structures which face onto public thoroughways shall be attractively landscaped with a landscape plan prepared by a licensed landscape architect, and shall be subject to review and approval from the Planning Department and Bureau of Street Maintenance, Street Tree Division.

##### **Mitigation Measures for the Off-Site Improvements**

- Existing trees affected by construction at off-site locations shall be relocated in proximity to their current locations if sufficient space is available. If trees cannot be located in immediate proximity, then trees shall be replaced at alternate locations in a public parkway location with similar specimens at a ratio of not less than one-to-one.

- Landscaping plans shall be prepared for each of the off-site road improvements that impact landscaping and shall be submitted to the appropriate regulatory agencies for approval.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

### Aesthetics

Proposed development, inclusive of the Equivalency Program, would alter the existing character of the site from predominantly undeveloped, vacant land to a developed appearance. This would result in a loss of visual relief amidst the urban environment, a valued resource. Although the site has a disturbed appearance, with remnants of past use, the loss of the visual relief is considered a substantial alteration of the site, and a significant impact. The Proposed development would replace the existing degraded site conditions (construction activities, power lines, ruderal vegetation, and remnants of past use) with a development offering a planned arrangement of buildings surrounded by newly landscaped slopes, buffers, and open space areas. The Proposed Project would provide a continuity of design between the eastern and western portions of the adjacent Playa Vista First Phase Project. The bluffs separate the proposed development from the communities to the south. Proposed development would have massing characteristics that are compatible with existing, adjacent development to the north. Therefore, the change in the visual character of the site would be less than significant, as the Proposed Project would not contrast with the visual character of the surrounding development so as to cause a degradation of the environment. During construction, short-term non-significant impacts would occur to the aesthetic character of the site. These impacts would be experienced by a few private viewers along the edge of the bluffs, a few private locations north of the Project site and along Jefferson Boulevard, a public thoroughfare. These conditions would cease as new development projects are completed.

In addition to these impacts, implementation of the Project's off-site mitigation improvements would result in small reductions in the amount of landscaping at some roadway widening locations. Also, construction activities at these locations would have short-term impacts on the aesthetic character of those locations. These impacts associated with the off-site improvements would be less than significant.

### Views

The analysis of impacts on specific views identified view impacts which would occur with implementation of the Proposed Project and which are unavoidable effects of the Project. The Project's off-site improvements would have no effects on views nor would they contribute to a cumulative impact on views. The impacts from the various view locations would be as follows:

- Westchester Bluffs: The Proposed Project site's undeveloped character would take on a developed appearance, moving the edge of the cityscape closer to the foot of the bluffs. However, the Proposed Project would not interfere with the panoramic views along the Westchester bluffs. Buildings would vary in height but would not exceed 112 feet AMSL, which is approximately 28 feet below the approximate average height of the bluffs at 140 feet AMSL. For the most part, building tops would blend with surrounding development and would not substantially alter existing views. Viewers at the easternmost end of the Bluffs could have their long-range view slightly fore-shortened but would still see the ocean and marina entryway. These impacts are considered less than significant, as Project development would not substantially obstruct an existing view of a valued view resource from a prominent view location.
- Mixed Use Areas North of the Project Site: Views over the Proposed Project site, toward the bluffs, would be altered for some offices and residential units along Jefferson Boulevard. As the loss of bluff views has been identified as a significant impact for public uses along Jefferson Boulevard, and the view loss for residential units along Jefferson Boulevard would be substantial, the loss of private views along Jefferson Boulevard is also considered significant.
- Jefferson Boulevard Thoroughfare: Views of the Westchester Bluffs would be altered for travelers along Jefferson Boulevard and replaced with new development. Impacts would be somewhat offset by Project design features (e.g. landscaped slope along Jefferson Boulevard and new views for travelers along Bluff Creek Drive). Nonetheless, there would be a substantial obstruction of a prominent view resource from a prominent (i.e. public roadway) location; and impacts on views along Jefferson Boulevard would be significant.

## 6.0 CUMULATIVE IMPACTS

Except as described below, new development from related projects is essentially outside of the Proposed Project's visual setting in which cumulative impacts could occur. Related Project 40, the adjacent Playa Vista First Phase Project, is located adjacent to the Proposed Project site on both its east and west ends, and would contribute to a cumulative impact on aesthetics and views. Otherwise, Related Project 25, LMU expansion, includes recently developed new facilities along the top of the bluffs, west of the Proposed Project site. Further to the west, Related Project 24, West Bluff residential, proposes to place approximately 120 new homes atop the bluffs west of Lincoln Boulevard. Any new development from the latter two projects, would add small incremental decreases in the amount of undeveloped area along the top of the bluffs. These three projects would contribute further to the loss of visual relief in the

urban setting, an impact that is designated as significant for the Proposed Project alone, and would hence be cumulatively significant, as well.

With regard to the general appearance of new development, Related Project 40, the Playa Vista First Phase Project, would increase the developed appearance of lands adjacent to the east and west of the Proposed Project site. Implementation of the Playa Vista First Phase Project would lessen the marginal impact of the Proposed Project; and the two Projects together would cause a greater alteration to the aesthetic character of the area than either would alone. The First Phase Project, like the Proposed Project, would include landscaping and other design features to maintain a continuity of design and avoid a degradation of the aesthetic character of the area. Therefore, cumulative impacts on aesthetic character from the related projects, in combination with the Proposed Project, would be less than significant. This conclusion is inclusive of the Proposed Project, the Equivalency Program and the Project's off-site improvements.

With regard to cumulative effects arising from regulations controlling the implementation of related projects, there are no known planned amendments that would alter the conclusions regarding the cumulative effects described above for views and aesthetics. Individual related projects noted above, have been, or would be subject to environmental review under CEQA, and have been, or would be reviewed for compliance with their applicable regulatory guidelines.

With regard to view impacts, Related Project 40, the Playa Vista First Phase Project, would be the only contributor to cumulative view impacts within the Proposed Project's immediate view corridors. The Playa Vista First Phase Project is expected to include buildings that would contribute to the obstruction of views along some view lines. In many of these cases, the Playa Vista First Phase Project buildings would also screen Proposed development from view, thus, reducing the impacts associated with the Proposed Project. The cumulative impact of the two Projects together (under both the Proposed Project and Equivalency Program scenarios) would be the same, regardless of which Project is developed first. The most notable view impact from the Playa Vista First Phase Project is a reduction in views of the bluffs for travelers along Jefferson Boulevard and Lincoln Boulevard. This impact would contribute to the obstruction of a view resource, which was considered significant for the Proposed Project alone, and would be cumulatively significant as well.

With regard to the views from the top of the Westchester Bluffs, the First Phase Project would contribute with the Proposed Project to an alteration of the near-view site appearance, but would not substantially obstruct the panoramic views available from the top of the bluffs. The Project's off-site improvements would have no effects on views nor would they contribute to a cumulative impact on views.



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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**P. CULTURAL RESOURCES**  
**(1) PALEONTOLOGICAL RESOURCES**

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**1.0 INTRODUCTION**

This section of the EIR addresses the potential impacts of the Proposed Project on Paleontological Resources which might lie within the Proposed Project site. The analysis describes the geology underlying the Project site and its potential for containing paleontologic resources. It also identifies Project activities that could potentially affect the resources directly or indirectly, and methods for the recovery and evaluation of paleontologic resources to the extent they might occur. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

Paleontology is a branch of the scientific disciplines of geology and biology which studies the life forms from the past, especially prehistoric life forms, through the study of plant and animal fossils. Local paleontological resources preserve an aspect of California history and a record of the geological and biological formation of the region. Paleontologic resources within the Proposed Project site could include: (1) fossil specimens; (2) fossil sites; (3) fossil-bearing rock units; and (4) rock units that have the potential for producing particular types of fossil remains because they have yielded similar remains in other nearby areas. Fossils, the remains or indications of once-living organisms, are an important scientific resource because of their use in: (1) documenting the evolution of particular groups of organisms; (2) reconstructing the environments in which they lived; and (3) dating the rock units in which they occur and the geologic events that resulted in the formation of these rock units.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Regulatory Framework**

The City of Los Angeles Conservation Element, Chapter II, Section 3, states that the City has a primary responsibility to protect paleontological sites pursuant to CEQA. As such, the City's policy is to identify and protect significant paleontological sites and/or resources known to exist or identified during land development, demolition or property modification activities. If land development occurs within a potentially significant paleontological area, "the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact

and mitigation of potential disruption of or damage to the site.” If significant resources are discovered, authorities must be notified and the designated paleontologist may cease construction activity in that portion of the project site. This cessation allows time for the assessment, removal or protection of the paleontological resources.<sup>531</sup>

## 2.2 Existing Conditions

Information regarding the existing site conditions is extracted from the “Paleontologic Resource Inventory/Impact Assessment Technical Report,” Appendix O-6 of the EIR.<sup>532</sup>

The paleontological resources of the Proposed Project site are described below by rock unit. The paleontological importance of each rock unit is also discussed in terms of the definitions provided in the methodology discussion, below. The rock units underlying the project site include Palos Verdes Sand and Holocene alluvium. Figure 107 on page 1188 shows the locations of these rock units.

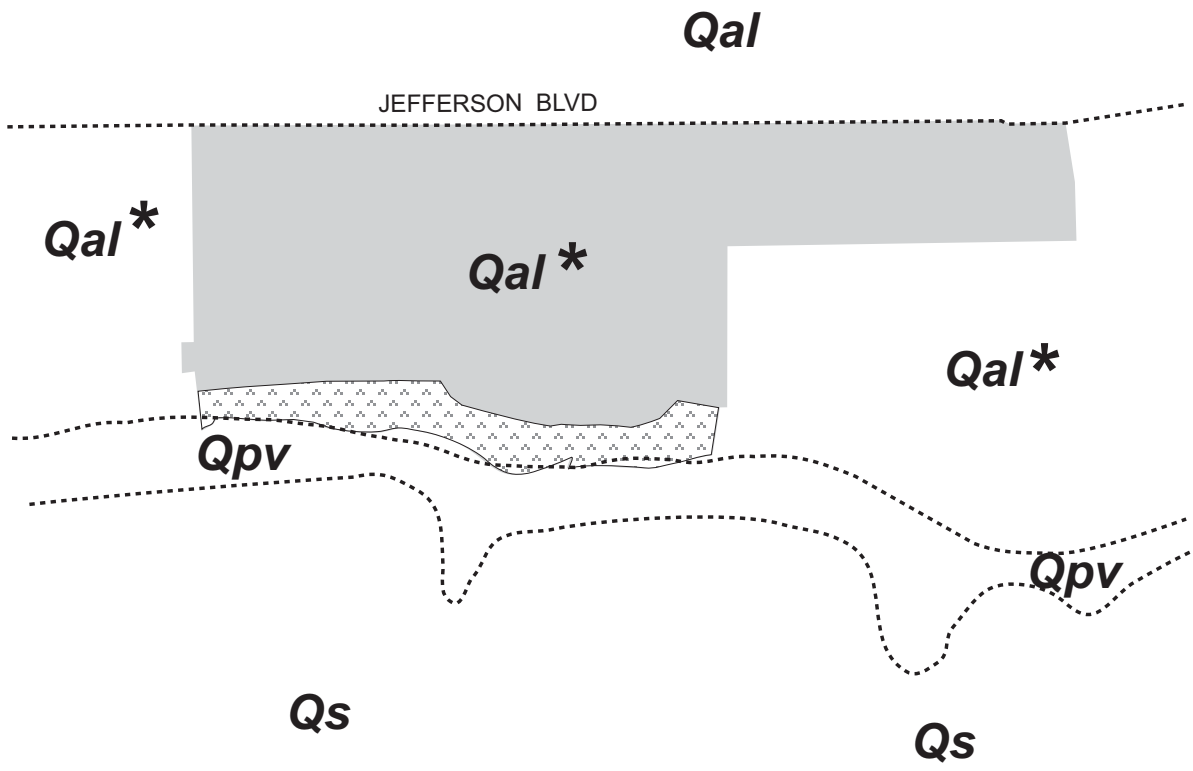
Such rock units in Southern California typically contain sediments and fossil remains that reflect the final retreat of the Pacific Ocean from the region. This retreat of the Pacific Ocean in turn reflects a tectonically induced uplift of the region. Should the rock units in the Project site yield fossil remains, these remains could be useful in: (1) further documenting the evolution of the groups of organisms these fossils represent; (2) refining the ages of the rock units; and (3) more accurately reconstructing the transition from a marine to a nonmarine environment in Southern California and the dramatic climatic changes that mark the end of the Pleistocene.<sup>533</sup> Rock units and fossil remains of the Pleistocene are particularly important due to the occurrence of a major extinction event in land mammals that also occurred at the end of the Pleistocene. Paleontological resources in the Project site could also have the potential for providing information on species previously unrecorded from the region and for filling important gaps in the fossil record.

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<sup>531</sup> *City of Los Angeles Conservation Element, Section 3. Adopted September 2001.*

<sup>532</sup> *“Paleontologic Resource Inventory/Impact Assessment Technical Report, prepared in support of the Village at Playa Vista, Los Angeles, California.” E. Bruce Lander, Ph.D., Paleo Environmental Associates, Inc, Altadena, California. June 2003.*

<sup>533</sup> *Martin, P.S. and R.G. Klein, eds., 1984, Quaternary Extinctions: A Prehistoric Revolution, The University of Arizona Press, Tucson, Arizona.*



**LEGEND**

- Qal** Holocene Alluvium
- Qpv** Upper Pleistocene Terrace Deposits-Palos Verdes Sand (includes Qpu subclassification)
- Qs** Quaternary Dune Sand
- Geologic Contact (approximate)
- Urban Development Component
- Habitat Creation / Restoration Component

\* Holocene Alluvium within these areas has been overlain with engineered (artificial) fill due to past site activities.

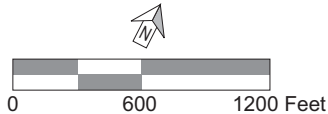


Figure 107  
Local Geology

Source: Law/Crandall, Inc., 1996 (As Modified by PCR and CDM), July 2003

All of the rock units within the Project site are, for the most part, entirely covered by artificial fill. Artificial fill is of no paleontological importance since the process (human earth-moving activities) that forms this rock unit typically destroys any fossil remains and their geologic context. Fill thicknesses in the Proposed Project site ranges from 2 to 11 feet. In the area adjacent to the foot of the Ballona Escarpment (i.e., Westchester Bluffs), fill averages a thickness of approximately 20 feet.<sup>534</sup>

### **2.2.1 Palos Verdes Sand**

The Palos Verdes Sand (undifferentiated Pleistocene deposits) rock unit has been mapped along the bluffs and underlies only portions of the area proposed for the Project's Habitat Creation/Restoration Component. No Palos Verdes Sand is located beneath the Project's Urban Development Component. The Palos Verdes Sand rock unit has a high paleontological potential. Artificial fill covers most of the area underlain by the Palos Verdes Sand rock unit.

There are no known previously recorded fossil sites occurring in the Palos Verdes Sand at the Proposed Project site. However, there have been three previously recorded fossil sites along the Westchester Bluffs approximately 0.6 mile from the Proposed Project site. The fossil assemblages are considered scientifically important. Should any fossils occur within the Proposed Project site, they could be of additional scientific importance. As such, the proximity of the three recorded sites indicates that the Palos Verdes Sand within the Project site could have a high potential to yield fossil remains.

### **2.2.2 Holocene Alluvium**

Holocene alluvium has been mapped as underlying both the Project's Urban Development Component and Habitat Creation/Restoration Components, north of the bluffs, where it is partly covered by artificial fill. In many parts of the Los Angeles Basin, areas immediately underlain by alluvium have yielded the remains of early Holocene nonmarine invertebrates, land mammals, other continental vertebrates, and land plants at numerous sites uncovered by excavation.

Boring logs from geotechnical investigations approximately 1.5 miles west of the Project site indicate the presence of fossil mollusk shells in the alluvium below the water table at depths ranging from 3 to 25 feet below the existing ground surface. In addition, a fossilized wood fragment was recorded at a depth of nearly 70 feet below the existing ground surface

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<sup>534</sup> *LeRoy Crandall and Associates, "Geotechnical Studies, Area D, T.T. 49104," for Maguire Thomas Partners, January 3, 1991, page 2.3.*

approximately 0.5 miles west of the Project site.<sup>535</sup> Using the boring logs and the depth of the water table as indicators, the alluvium at depths below the water table are considered to have a high potential to yield fossil remains, whereas those portions of the rock unit located above the water table would have a low potential to yield fossil remains. Recent monitoring conducted in concert with the excavation of the adjacent Playa Vista First Phase Project by Statistical Research, Inc. (SRI) and LSA Associates has not resulted in the recovery of any fossil remains.

The boring logs that have been collected to date do not provide an indication of the potential scientific importance of the fossil shell remains since no information was recorded regarding the species represented or the age of these remains. The paleontological importance of these fossil shells could range from a high level of importance, if they are identifiable, to low importance if they are not identifiable due to the poor physical condition of the remains. Also, the paleontological importance of successive samples of fossil remains would be expected to decline in importance if subsequent samples from the same depth yielded only the same species. Therefore, the scientific importance of any fossil remains from the alluvium within the Project site could range from high to low importance, but is currently unknown.

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

A baseline inventory of paleontological resources for the Proposed Project site was developed by Paleo Environmental Associates, Inc. The inventory was based on a review of published and unpublished paleontological and geologic literature and maps of the Project site and vicinity; a paleontological archival search at the Natural History Museum of Los Angeles County which contains collections from the University of California, Los Angeles and the California Institute of Technology; and a 1989 field survey of the Project site and vicinity. This baseline inventory was used to determine the rock units in the Project site, to document the respective areal distributions of these rock units, to determine the presence of any previously recorded paleontological sites, and to document the occurrence of any previously unrecorded paleontological sites.<sup>536</sup>

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<sup>535</sup> *LeRoy Crandall and Associates, "Geotechnical studies, Tentative Tract No. 44857," LC&A Job Number AE-86125-L, Appendix A, Volumes III through VI, 1988.*

<sup>536</sup> *"Paleontologic Resource Inventory/Impact Assessment Technical Report, prepared in support of the Village at Playa Vista, Los Angeles, California." E. Bruce Lander, Ph.D., Paleo Environmental Associates, Inc, Altadena, California. June 2003.*

Within the inventory, identifiable fossil specimens are considered scientifically “highly important” if they are: (1) complete; (2) well preserved; (3) age diagnostic; (4) useful in environmental reconstruction; (5) used to describe a species; (6) representative of a rare group of organisms; or (7) part of a diverse assemblage. Identifiable large invertebrate fossils, such as the remains of snail, clams, and sand dollars visible to the unaided eye, are considered highly important scientifically because they allow accurate age determinations and environmental reconstructions for the rock units in which they occur. Paleontological importance of successive samples of fossil remains would be expected to decline in importance if subsequent samples from the same depth yielded only the same species.

### **3.2 Significance Thresholds**

The Draft City of Los Angeles CEQA Thresholds Guide (p. M.1-3), states that the determination of the significance of paleontological impacts shall be made on a case-by-case basis, considering the following factors:

- (1) Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- (2) Whether the paleontological resource is of regional or statewide significance.

Based on these factors, the Project would have a significant impact on paleontological resources, if:

- The Project would result in the permanent loss of, or loss of access to, a paleontological resource.

### **3.3 Project Design Features**

The Proposed Project does not include Project Design Features that would mitigate impacts.

### **3.4 Project Impacts**

The Draft Los Angeles CEQA Thresholds Guide identifies two factors to be used for determining the significance of a project’s impacts on paleontological resources (see Subsection 3.2, above). The first factor has been established as the Project’s significance threshold. The second factor focuses on resources that are of regional or statewide significance. As the established significance threshold applies to all resources, including those of regional or

statewide significance, the second factor is addressed within the following discussion of impacts on paleontological resources.

### **3.4.1 Urban Development Component**

This Project component would include the placement of new buildings throughout the Project site, and require grading to accommodate the development proposed. In general, development areas would require the addition of fill materials to provide suitable building pad elevations and characteristics. Portions of the subject fill and the existing soil would subsequently be removed, in conjunction with building excavation (i.e., development of subterranean parking). The deepest building excavation would occur at limited locations for buildings with two-level garages where development would reach depths of approximately two feet below mean sea level to two feet above mean sea level (AMSL). In addition, pile driving may be used in some cases throughout the Project site and would penetrate the water table (generally at 0 feet to four feet AMSL). The total amount of cut associated with the Proposed Project is approximately 0.28 million cubic yards (mcy). The total amount of fill would be 0.70 mcy.

Potential impacts to paleontological resources could occur if there is excavation or covering of sites, which contain the Holocene alluvium that underlies the Project site. As indicated, in the Environmental Setting section above, this soil unit is considered to have a high impact potential at depths below the water table. As the Proposed Project would involve excavation into this soil, any resources that may be encountered and not made available for recovery and evaluation could be destroyed. Therefore, the project could result in the permanent loss of paleontological resources and a significant impact could occur.

The Proposed Project could also expose or facilitate access to fresh exposures of fossiliferous rock units and create a potential for unauthorized fossil collecting. Unauthorized collection of fossils is not expected to disturb the rock units, but could result in the loss of additional fossil remains, scientific information, and fossil sites. Unauthorized collecting could occur in areas of ground disturbance during construction, including areas of excavation and in spoils piles resulting from excavation activities. Such collecting would be considered a potentially significant impact as there would be a permanent loss of a paleontological resource.

Beyond, these potential resource impacts resulting from construction activities, the placement of buildings within the Project site would cover substantial portions of the Project site and thereby could limit future access to excavations within the Holocene alluvium lying below the water table at some locations. Such ground coverage is not likely to have an actual effect on resources due to a number of mitigating factors: (1) any potential resources would remain undisturbed, in situ; (2) large areas of the Project site would remain accessible for future

excavation/boring into this soil unit (e.g., habitat creation/restoration areas, parks and private open space); (3) there are no known resources lying below the Project buildings; and (4) there is currently no desire or impetus from the scientific community to perform research at the Proposed Project site, and Proposed Project excavations provide an opportunity to discover resources, should they be present.

However, the placement of the buildings at some locations could limit future access to the Holocene alluvium lying below the water table, which has been identified as having high resource potential. Therefore, a potentially significant impact could occur as there could be a potential loss of access to a paleontological resource. However, access to potential resources underlying the Project site would continue to be available within large portions of the Project site, including the park and landscaped areas throughout the Urban Development Component area, as well as the Project's Habitat/Restoration Component area, allowing continued access at these locations.

### **3.4.2 Habitat/Restoration Component**

This Project component includes grading/excavation along the foot of the bluffs to create the riparian corridor, slope stabilization along the face of the bluffs, and further hand digging of plant roots along the face of the bluffs. It also includes the planting of new vegetation in both the riparian corridor and bluff restoration area.

Palos Verdes Sand (considered to have high impact potential) has been mapped along the bluffs, and Holocene alluvium (considered to have high resource potential below the water table) lies at the base of the bluffs. Both of these soils are covered by artificial fill.

The excavation and stabilization activities could potentially extend beyond the artificial fill and uncover fossil resources. If a resource were encountered and not made available for recovery and evaluation, the impact would be significant as there would be a potential permanent loss of a paleontological resource. Therefore, mitigation measures are included to provide for site monitoring, and the recovery and evaluation of resources should they be encountered.

The open space that this component of the Project provides also will continue to allow access to any potential paleontological resources that may underlie the Project site.

### **3.4.3 Summary of Project Impacts**

At some limited locations within the Project site, proposed construction activities would cause excavation into and/or disturbance of soils rated as having high paleontologic impact potential. If resources were to be encountered, there would be a potential for a permanent loss of



resources, and impacts from direct construction activities would be considered potentially significant, prior to mitigation. Further, if such resources were exposed, and unauthorized collections were to take place, this would also be considered a potential loss of such resources, and a potentially significant impact, prior to mitigation. Mitigation measures are included below to address potential Project impacts. These measures would require compliance with Society of Vertebrate Paleontology standard guidelines.<sup>537</sup>

The longer term placement of buildings on the Project site would limit future access to the soils underling the Project site that have been rated as having paleontologically high impact significance until such future time as Project related buildings are demolished, altered or removed. In addition, access to any potential resources would continue to be available from open spaces areas of the Project site. A mitigation measure below requires information regarding the location of any potential resources to be included in and archived as part of the treatment plan for paleontological resources. Therefore, it is not likely that this would result in adverse effects on scientific, paleontological knowledge.

#### **3.4.4 Equivalency Program Impacts**

The preceding analysis of potential impacts on paleontological resources addressed the following issues: (1) destruction of resources; (2) exposure of resources to unauthorized collection; and (3) limiting access to resources. Such impacts could occur as a result of site preparation activities (e.g., excavation) or the placement of buildings within the Project site.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations, building pad elevations, or the depth of excavation. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the proposed earth moving activities and their associated impacts because all that is changing is the type of use occupying a building.

All of the recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, below) to minimize impacts on paleontological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as with the Proposed Project, and the mitigation measures would be the same,

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<sup>537</sup> *Assessment and Mitigation of Adverse Impacts on Non-Renewable Paleontological Resources: Standard Guidelines. Society of Vertebrates Paleontologists New Bulletin, Volume 163, pg. 22-27, 1995. Condition of Receivership of Paleontological Salvage Collections. Society of Vertebrates Paleontologists News Bulletin, Volume 166, pgs. 22-27, 1996.*

potential impacts on paleontological resources would be the same. Thus, implementation of the Equivalency Program, as is the case with the Proposed Project, would not result in a permanent loss of, or loss of access to, paleontological resources, and impacts would be less than significant.

### **3.4.5 Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue.

While the possibility exists in the Los Angeles Basin that any deep excavation could encounter fossil-bearing rock units, excavation for the off-site improvements would be surficial and located in previously disturbed areas. All of the off-site improvements except the water regulator station occur within or adjacent to existing roadways. The water regulator station would include a small amount of piping equipment that would most likely be located just above ground. Excavation would be required to the depth of the existing main water line. Therefore, excavation into resource bearing rock units is not anticipated, and no impacts are expected on paleontological resources at the off-site locations.

The City of Los Angeles Standard "Specifications for Public Works Construction, Section 6-3.2 requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures. If such a resource were encountered, within the City of Los Angeles, Public Works Section 6-3.2 would be applied. Therefore, none of the off-site improvements would result in significant impacts, unto themselves, nor would the off-site improvements, in combination with the Proposed Project result in a significant impact.

## **4.0 MITIGATION MEASURES**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of grading/excavation permits, a qualified paleontologist shall be retained to develop an acceptable monitoring and treatment plan and to monitor

construction activities at the Project site that might adversely impact potential paleontological resources in the Proposed Project area. The qualifications of the paleontologist and its designee shall be evaluated, and the development of the monitoring and treatment plan shall be made in consultation with the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County to ensure Project compliance with Society of Vertebrate Paleontology standard guidelines as appropriate.

- A monitoring and treatment plan for paleontological resources shall include the following measures:
  - A qualified paleontologist or qualified designee shall monitor ground-disturbing activities at the Project site on a full-time basis along the lower part of the bluff where the Palos Verdes Sand would be disturbed. Monitoring shall consist of visually inspecting fresh exposures of rock for fossil remains large enough to be seen and, where appropriate, collecting and processing rock samples or excavated spoils to allow for the recovery of smaller fossil remains that are too small to be seen in the field.
  - If auguring or excavation is implemented in the alluvium of the Project site north of the bluff and extends to a depth below the water table, a qualified paleontologist or qualified designee shall monitor these activities on a full-time basis. Excavation or auguring in the alluvium at a depth above the water table shall be monitored on a half-time basis. Monitoring shall not be implemented until these activities have penetrated 5 feet of previously undisturbed strata under any artificial fill
  - If fossil remains large enough to be seen are uncovered by earth-moving activities, a qualified paleontologist or qualified designee shall divert these activities temporarily around the fossil site until the remains have been recovered, a rock sample has then been collected to process to allow for the recovery of smaller fossil remains, if warranted, and construction has been allowed to proceed through the site by a qualified paleontologist or qualified designee. If potentially significant resources are encountered, a letter of notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading.
  - A qualified paleontologist or qualified designee shall collect all identifiable vertebrate fossil remains and samples of megainvertebrate fossil remains. All fossil sites shall be plotted on a topographic map of the Project site.
  - If a qualified paleontologist or qualified designee is not present when fossil remains are uncovered by earth-moving activities, these activities shall be stopped, and a qualified paleontologist or qualified designee shall be called to the site immediately to recover the remains.

- At a qualified paleontologist or qualified designee’s discretion and to reduce any construction delay, a construction worker shall assist in removing fossiliferous rock samples to an adjacent location for temporary stockpiling pending eventual transport to a laboratory facility for processing.
- A qualified paleontologist or qualified designee shall conduct the processing (wet and/or dry screening and heavy-liquid flotation) of the rock samples to allow for the recovery of smaller fossil remains. Additional rock samples shall be collected from a fossil site considered sufficiently productive to warrant processing. However, no more than 6,000 pounds each from either the Palos Verdes Sand or the alluvium will be processed (12,000 pounds total).
- All fossil remains recovered in the field as a result of monitoring or by processing rock samples shall be prepared, identified, catalogued, curated, and accessioned into the fossil collections of the Natural History Museum of Los Angeles County or another museum repository complying with the Society of Vertebrate Paleontology standard guidelines. Accompanying specimen and site data, notes, maps, and photographs also shall be archived at the repository.
- Within 6 months following completion of the above tasks, a qualified paleontologist or qualified designee shall prepare a final report summarizing the results of the mitigation program and presenting an inventory and describing the scientific significance of any fossil remains accessioned into the museum repository. Moreover, any site or geologic data indicating the possible presence and locations of additional fossil sites underlying the Project site will be discussed in the report so that future access to these sites will be maintained in the event of any future demolition, alteration, or removal of buildings built in connection with the Project. The report shall be submitted to the City of Los Angeles Planning Department and the museum repository. The report shall comply with the Society of Vertebrate Paleontology standard guidelines for assessing and mitigating impacts on paleontological resources.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

The recommended mitigation measures and associated potential to provide paleontologic benefits, as well as the possibility that potential paleontologic resources within the open space portions of the Proposed Project area would remain undisturbed and accessible to scientific investigation, lessens potential impacts. The Proposed Project’s potential adverse impacts to paleontologic resources from construction activities, inclusive of the Equivalency Program and the off-site improvements, is expected to be reduced to a less-than-significant level since there would not be a permanent loss of a paleontological resource by allowing for the recovery of some remains and data, thereby ensuring their preservation in a museum and their availability for future study by qualified investigators.

As paleontological resources may occur below the Project site in soils having a high paleontologic impact potential, the long-term placement of buildings on the Project site, under both the Proposed Project and the Equivalency Program, would limit but not ultimately preclude future access. Further, the paleontological treatment plan requires the archiving of any data regarding the extent and location of any potential resources. The Project's off-site improvements would not limit future access to any potential paleontological sites. Therefore, the Project's impact on paleontological resources after mitigation is not considered to be significant.

## **6.0 CUMULATIVE IMPACTS**

The Proposed Project, in combination with other projects in the region where a project site is underlain by the Palos Verdes Sand or alluvium, might lead to cumulative impacts on paleontologic resources. These impacts could include the loss of paleontologic resources as a result of earth-moving activities and unauthorized fossil collecting, as well as the loss of access to these resources where they are covered by the construction of new buildings.

However, the Proposed Project would not result in a loss of access to the Palos Verdes Sand at the foot of the Westchester Bluffs, and therefore there would be no cumulative impact on the paleontologic resources of the Palos Verdes Sand associated with development of the Proposed Project site. Moreover, lands in the Project vicinity, including some areas within the Proposed Project site, the Playa Vista First Phase Project site, and in the areas west and north of the First Phase Project would remain undeveloped. These areas underlain by alluvium remain accessible. Continued access to these areas would substantially reduce the cumulative impact of the Proposed Project on paleontologic resources.

It is expected that the City of Los Angeles policies for the protection of paleontological resources, and mitigation for related projects via CEQA review would be implemented. In addition, the Project's mitigation measures would reduce potential cumulative impacts. By allowing for the recovery of some fossil remains that would not have been exposed without the Proposed Project site, and continued access to some areas underlain by the alluvium, and the implementation of mitigation measures, cumulative impacts inclusive of the Proposed Project would be less than significant. This conclusion applies to the Project, Equivalency Program and construction of off-site improvements.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**P. CULTURAL RESOURCES**  
**(2) ARCHAEOLOGICAL RESOURCES**

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**1.0 INTRODUCTION**

This section addresses the potential impacts that could occur from the proposed development on archaeological resources that could potentially be present in the Proposed Project site. The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

Archaeological resources are the material remains of past human life and behavior. These resources often have scientific, cultural, religious, and educational value. By law, the effects of the Project need to be evaluated for significant archaeological sites that are at least 50 years old.

**2.0 ENVIRONMENTAL SETTING**

**2.1 Regulatory Framework**

**2.1.1 Federal Level**

The National Historic Preservation Act of 1966 (NHPA), as amended, established the Advisory Council on Historic Preservation (an independent Federal agency) to advise the President and Congress on historic preservation matters, to recommend measures to coordinate Federal historic preservation activities, and to comment on federal actions affecting properties included in or eligible for inclusion in the National Register of Historic Places. Section 106 of the NHPA requires federal agencies to consider the effects of their actions on historic properties, provide for public participation, and invite interested parties to participate in a process to address adverse effects on historical properties. To comply with Section 106 of the NHPA, the Advisory Council on Historic Preservation has developed the following five-step process:<sup>538</sup>

- (1) Determine if the Proposed Project is an undertaking subject to the NHPA.

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<sup>538</sup> 36 CFR §800, *Protection of Historic and Cultural Properties*.

- (2) Identify historical properties and evaluate their eligibility for inclusion in the National Register.
- (3) Determine whether the federal action, including permit actions, would have an adverse effect on historical properties.
- (4) Resolve the adverse effect of the Project culminating in a Memorandum of Agreement or Programmatic Agreement among the parties.
- (5) Proceed with undertaking if the parties cannot come to an agreement, proceed with the federal action after taking into account the Advisory Council on Historic Preservation comments.

Pursuant to Section 800.13 of the regulations (36 CFR Part 800) that implement Section 106 of the National Historic Preservation Act (16 U.S.C. 470f),<sup>539</sup> a Programmatic Agreement among the U.S. Army Corps of Engineers Los Angeles District, the Federal Advisory Council on Historic Preservation and the State Historic Preservation Officer was executed on October 22, 1991 (Appendix O-1 of the EIR). The agreement was reached in connection with the granting of a federal permit by the United States Army Corps of Engineers for the fill of wetlands within the former Playa Vista Planning Area (USACE Permit No 90-426-EV). The USACE conferred with the Native American Heritage Commission and invited all affiliated Native American organizations and/or individuals to review the Agreement; two local Native American groups of Gabriellino descent responded and signed the Programmatic Agreement. In October 2001, the Programmatic Agreement was extended to cover the time period through October 22, 2011.<sup>540</sup>

In compliance with the Programmatic Agreement, the U.S. Army Corps of Engineers (USACE) inventoried the Area of Potential Effect (APE) for historic properties and developed Archaeological Treatment Plans and an Historic Resources Treatment Plan for historic properties that will be adversely effected by the Proposed Project.<sup>541</sup>

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<sup>539</sup> “*Programmatic Agreement Among the U.S. Army Corps of Engineers – Los Angeles District, The Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding Implementation of the Playa Vista Project,*” approved by the Advisory Council on Historic Preservation, October 22, 1991. The Advisory Council on Historic Preservation is an independent federal agency.

<sup>540</sup> Sudol, Mark F., Chief, Regulatory Branch, Department of the Army, letter to Mr. Marc Huffman, Playa Vista, October 30, 2001.

<sup>541</sup> Altschul, Jeffrey, H., et al., *Playa Vista Archaeological and Historical Project, Research Design, Statistical Research Technical Series No. 29, Part 1.* Statistical Research Inc., Tucson, Arizona, 1991.

The Programmatic Agreement addresses all of the former Playa Vista Planning Area. It assures that the 1992 permit authorizing the fill of wetlands within the Proposed Project site will be administered in accordance with the requirements of the Playa Vista Archaeological and Historical Research Design that are applicable to the land outside of the wetland pockets as well as within.

The Research Design provides a comprehensive framework for evaluating archaeological and historical resources that may be affected by the Proposed Project. The Research Design presents relevant research questions, provides current knowledge of the archaeological and historical resources, describes potential impacts to prehistoric resources, and outlines future steps to mitigate potential adverse impacts of the Proposed Project on these resources. The Research Design has been approved by the U.S. Army Corps of Engineers, the State Historic Preservation Officer, the California Coastal Commission, the City of Los Angeles, the U.S. Department of Justice, the Sixth Council District of the Los Angeles City Council, and Native Americans of Gabriolino descent.<sup>542</sup> A peer review panel of three archaeologists<sup>543</sup> has also reviewed the Research Design, as required by the archaeological guidelines of the California Coastal Act. The final Research Design incorporates relevant information and comments obtained from public agencies and individuals knowledgeable about archaeological sites and the history of the Project site. Based on that design, on-going field research has been occurring through the present.

In April 2003, SRI prepared an update to the Research Design to bring it current with research activities of the past 12 years: “At the Base of the Bluffs.”<sup>544</sup> The update addresses activities regarding the Proposed Project, inclusive of research, resource boundary testing, National Register evaluations, and an Archaeological Treatment Plan (ATP) for resources encountered in the Proposed Project Site. As such, the update constitutes the Project specific Research Design and Treatment Plan for the Proposed Project.

The Programmatic Agreement stated the USACE determination that development within the former Playa Vista Planning Area would have an effect on properties included in, or eligible for, the National Register. The Programmatic Agreement specifies that development within the land area covered by the Programmatic Agreement shall be administered in accordance with

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<sup>542</sup> *The approval by the Sixth Council District was prior to redistricting and assignment of the Proposed Project site to the Eleventh Council District.*

<sup>543</sup> *The peer review panel consisted of Dr. Patricia Martz (California State University, Los Angeles), Dr. Charles Rosaire (Curator Emeritus of the Los Angeles County Museum), and Dr. John Johnson (Curator of Anthropology, Santa Barbara Museum of Natural History). Interested groups include the Native Americans of Gabriolino descent.*

<sup>544</sup> *Altschul, Jeffrey, H., et al., Playa Vista Archaeological and Historical Project, At the Base of the Bluff, Archaeological Inventory and Evaluation along Lower Centinela Creek, Marina del Rey, California. Statistical Research, Inc. Tucson, AZ, Redlands, CA, April 2003.*



specific terms and conditions in order to take into account the effects of any development on historical properties.

### 2.1.2 State Level

The California Environmental Quality Act (CEQA), is the principal statute governing environmental review of projects occurring in the state.

There are two areas of CEQA that are relevant to the process for evaluating the significance of archaeological resources. Section 21083.2 of the California Public Resources Code sets forth the process for evaluation and treatment of “unique archaeological resources.” In addition, archaeological resources also may be “historical resources” under Sections 21084 and 21084.1 of the California Public Resources Code.

Regarding unique archaeological resources, CEQA provides that:

“As part of the determination made pursuant to Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. An environmental impact report, if otherwise necessary, shall not address the issue of nonunique archaeological resources.”<sup>545</sup>

Under CEQA, “‘unique archaeological resource’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.”<sup>546</sup>

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<sup>545</sup> *California Public Resources Code Section 21083.2(a).*

<sup>546</sup> *California Public Resources Code Section 21083.2(g).*

No further consideration need be given to a nonunique archaeological resource, “other than the simple recording of its existence by the lead agency if it so elects.”<sup>547</sup>

For unique archaeological resources, the statute also provides examples of treatments. If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

- “(1) Planning construction to avoid archaeological sites.
- (2) Deeding archaeological sites into permanent conservation easements.
- (3) Capping or covering archaeological sites with a layer of soil before building on the sites.
- (4) Planning parks, greenspace, or other open space to incorporate archaeological sites.”<sup>548</sup>

Regarding mitigation, the statute also provides that excavation “shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.”<sup>549</sup>

The CEQA process for evaluating historical resources, including archaeological resources that may be historical resources, is set forth in Section 15064.5 of the State CEQA Guidelines. According to the Section 15064.5(c)(1), the first step is for the lead agency to determine if the resource is an historical resource under the following criteria which are set forth in Section 15064.5(a):

- (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 (Pub. Res. Code [Section] 5024.1, Title 14 CCR, Section 4850 et seq.).

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<sup>547</sup> *California Public Resources Code Section 21083.2(h).*

<sup>548</sup> *California Public Resources Code Section 21083.2(b); see also State CEQA Guidelines Section 15126.4(b)(3).*

<sup>549</sup> *California Public Resources Code Section 21083.2(d).*

- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:
- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
  - (B) Is associated with the lives of persons important in our past;
  - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
  - (D) Has yielded, or may be likely to yield, information important in prehistory or history.

Where an archaeological site does not meet these criteria "but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2."<sup>550</sup> In those cases where an "archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process."<sup>551</sup>

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<sup>550</sup> *State CEQA Guidelines Section 15064.5(c)(3).*

<sup>551</sup> *State CEQA Guidelines Section 15064.5(c)(4).*

Under the California Register statute, any California resource formally determined eligible for listing in the National Register of Historic Places is automatically listed in the California Register.<sup>552</sup> Therefore, those archaeological sites within the Project site that have been determined eligible for the National Register under the Programmatic Agreement are also listed in the California Register and are historical archaeological resources for purposes of CEQA.

In coordination with other laws outside of CEQA, the State CEQA Guidelines also sets forth special rules where there is a likelihood of Native American human remains within the project:

A lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code [Sections] 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

- (1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
- (2) The requirements of CEQA and the Coastal Act.<sup>553</sup>

Under CEQA, a project “that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.”<sup>554</sup> There is a substantial adverse change in the significance of an historical resource in the case of “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”<sup>555</sup> The State CEQA Guidelines sets forth the process for evaluating when the significance of an historical resource is materially impaired. This would occur when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in

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<sup>552</sup> *California Public Resources Code Section 5024.1.*

<sup>553</sup> *State CEQA Guidelines Section 15064.5(d); see also State CEQA Guidelines Section 15064.5 (e) for requirements in the event of unanticipated discovery of human remains.*

<sup>554</sup> *California Public Resources Code Section 21084.1; State CEQA Guidelines Section 15064.5(b).*

<sup>555</sup> *State CEQA Guidelines Section 15064.5(b)(1).*

the California Register of Historical Resources, a local register of historical resources or its identification in an historical resources survey.<sup>556</sup>

The State CEQA Guidelines provide guidance for the consideration of archaeological resources. Section 15126.4(b)(3) states:

“Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

- (A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
- (B) Preservation in place may be accomplished by, but is not limited to, the following:
  - 1. Planning construction to avoid archaeological sites;
  - 2. Incorporation of sites within parks, greenspace, or other open space;
  - 3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.
  - 4. Deeding the site into a permanent conservation easement.
- (C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.
- (D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and

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<sup>556</sup> *State CEQA Guidelines Section 15064.5(b)(2).*

that the studies are deposited with the California Historical Resources Regional Information Center.<sup>557</sup>

### 2.1.3 City of Los Angeles

The Proposed Project would also be required to comply with the Standard Specifications for Public Works Construction, Section 6.3-2. This regulation requires that ground disturbing activities be halted in the area of a paleontological or archaeological find until such time a resource expert can review the find, determine its significance and, if required, determine appropriate mitigation measures. This regulation only applies to public projects. However, required mitigation measures associated with the Project could apply to public projects; therefore, this regulation still applies to the Project.

## 2.2 Existing Conditions

### 2.2.1 Archaeological and Historical Records in the Regional Context

The following discussion has been extracted from the Playa Vista Archaeological and Historical Project Research Design by Jeffrey H. Altschul, et al.<sup>558</sup> and a more recent report and archaeological investigations in the Project area by Jeffrey H. Altschul, et al.<sup>559</sup>

#### 2.2.1.1 Archaeological Record

The earliest commonly accepted dates of human occupation of the Los Angeles Basin are from the La Brea site upstream of the Ballona Lagoon near downtown Los Angeles. Skeletal remains from “La Brea Woman” have been dated to about 9,000 years ago, around the same time as the “big game hunting tradition for mammoths” and other large animals were established over much of North America. Beyond these skeletal remains, few artifacts of this time have been found in Los Angeles County.

Evidence of human use in the Ballona Lagoon begins about 4,500 B.C. Excavations at five large midden sites on the top of the bluffs adjacent to the Project site suggest that the area was visited repeatedly for the next 3,500 years. Early occupation appears to have been exclusively temporary camps from which small groups exploited the resources of the wetlands

<sup>557</sup> *State CEQA Guidelines Section 15126.4(b)(3).*

<sup>558</sup> *Altschul, Jeffrey H., et al., 1991, Playa Vista Archaeological and Historical Project: Research Design.*

<sup>559</sup> *Altschul, Jeffrey, H., et al., Playa Vista Archaeological and Historical Project, At the Base of the Bluff, Archaeological Inventory and Evaluation along Lower Centinela Creek, Marina del Rey, California. Statistical Research, Inc. Tucson, AZ, Redlands, CA, April 2003.*

for short periods before moving elsewhere. Occupation became more intensive and continuous from 1000 B.C. to A.D. 1000; four previously recorded archaeological sites on top of the Bluffs, adjacent to the Project site, have evidence of occupation during that period. The first evidence of settlement in the area derives from five sites along the Centinela Ditch, and one site near the southeastern edge of the historical lagoon near Lincoln Boulevard and Bluff Creek Drive.<sup>560,561</sup>

Whereas use of the bluff tops decreased dramatically after A.D. 1000, recent radiocarbon dates indicate that the lagoon edge was occupied for at least another 500 years. Although the Project site and surrounding areas were favored locations for settlement, beginning about A.D. 500 and continuing until about A.D. 1100, an apparent shift in settlement preference from the top of the bluffs to the edge of the Ballona Lagoon and its freshwater tributaries of Ballona Creek and Centinela Ditch occurred. The shift to the edge of the lagoon and its freshwater tributaries could have been to maintain access to critical resources. Prehistoric use of the Ballona Lagoon appears to have ended around A.D. 1100 based on current information, although the reasons for the abandonment of the Ballona Lagoon area are unknown.

### 2.2.1.2 Historical Record

European exploration of California began in 1542, with the arrival of Juan Rodriguez Cabrillo, but it was not until 1769 that the Spanish presence was felt in the Los Angeles Basin. At that time, Don Gaspar de Portola first made contact with the group of Native Americans that later became known as the Gabrielino. Portola reported stopping at a Native American village called “Yang’na” on the Los Angeles River near present day downtown Los Angeles, but he did not cross the Ballona Lagoon on his route to Monterey.

At the time of Portola, the Ballona Lagoon may have been occupied by Cupan speakers of the Takic language family. These people called themselves Kumi’vit, but they are better known by the name given them by Spaniards, Gabrielino. Archaeological evidence indicates that the Gabrielino moved out of the Great Basin and southern California deserts and settled the Southern California coast by at least A.D. 500. Evidence of proto-historic settlement of the Ballona is best documented at CA-LAN-211 in the Proposed Project area.<sup>562</sup> This site may be the remains of Indians who returned to the Ballona after leaving the mission. Some anthropologists suggest that a Gabrielino village named “Saan” or “Sa’angna” was situated in the Ballona

<sup>560</sup> Grenda, Donn R., Jeffery A. Homburg, and Jeffery H. Altschul, *the Centinela Site (CA-LAN-60): Data Recovery at a Middle Period Creek-Edge Site in the Ballona wetlands, Los Angeles County, California. Statistical Research Technical Series 45.*

<sup>561</sup> Altschul, J. H., *Statistical Research, Telephone Communication, July 16, 2003.*

<sup>562</sup> Jeff Altschul, *personal communication, February 19, 2003.*

Lagoon area prior to missionization. However, that name does not appear in the historical records.<sup>563</sup>

Two years after the 1769 Portola expedition, Mission San Gabriel was founded in what is now the City of San Gabriel. The local Native Americans were first encouraged and later forced to move to the mission. Large numbers of Native Americans died from disease or intolerable living conditions during this period.

By the late 1700s and early 1800s, Ballona Creek and the lagoon area were periodically used by Spanish ranchers from Los Angeles County and San Gabriel Valley for stock pasturage. In 1839, Rancho La Ballona was granted by Governor Alvarado to the Machado and Talamantes families. These families used most of the land for cattle. The break-up of Rancho La Ballona began in 1857 with the death of Talamantes followed by the death of Machado in 1865. Most of their heirs sold the land within a decade. During this time the Union Army encampment of Camp Latham was established in 1861 about 5 miles inland on Ballona Creek north of the Project site, but was abandoned in 1862.

The advent of the railroad in the Ballona area and elsewhere in the mid-1880s led to a land boom that resulted in the development of Santa Monica and Ocean Park. Land speculation schemes such as Port Ballona in 1887 foreshadowed the development of present-day Marina del Rey. The development of communities currently surrounding the project area occurred during the early twentieth century. These communities include: (1) Playa del Rey, formerly Port Ballona, which originally consisted of a hotel, pavilion, boathouse, hunting clubs, and a motordrome for auto-racing in the Ballona Lagoon; (2) Venice, modeled after the Italian city including canals; (3) Culver City, the early home of the movie industry and aircraft research; and (4) Westchester, the seat of Loyola Marymount University.

Commercial and industrial enterprises began to move into the Ballona area during the early twentieth century. Oil wells and refineries became commonplace. By 1931, there were 325 active oil wells in the Ballona Lagoon, with refineries and tanks built on islands of fill.<sup>564</sup> World War II and increased oil demand depleted most of the Ballona oil wells, and most of the derricks were dismantled in the 1950s and 1960s.

The natural setting and accessibility of Ballona Creek led the movie industry to nearby Culver City. The corresponding increase in urban development prompted the channelization of Ballona Creek for flood control. In the early 1920s, the upper course of the creek was

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<sup>563</sup> Van Horn, David M. and White, Laurie, S. "A Study of Sa'angna." 1997, Statistical Research, Inc

<sup>564</sup> Schofield, R., Hughes Aircraft, retired, telephone communication, July 30, 1990.



channelized to about present day Lincoln Boulevard. The channelization was completed by the U.S. Army Corps of Engineers in 1935, at the suggestion of the Los Angeles Flood Control District. Although subject to tidal fluctuations, the channelized lower course of Ballona Creek became a two-mile rowing course used by sculling crews from the surrounding universities.

During the 1920s and 1930s, Japanese truck farmers leased most of the land in the former Playa Vista Planning Area from Joseph Mesmer, and raised celery crops in the low marshy area of the Ballona Wetlands, west of Lincoln Boulevard. By 1942, the Japanese farmers and their families were relocated to detention camps in reaction to the attack on Pearl Harbor. Members of the local Hispanic community, including Pepe Lopez, assumed the Japanese leases.

Lands within the former Playa Vista Planning Area became associated with Howard Hughes during the early 1940s. Hughes, a millionaire industrialist, who parlayed his inherited fortune into an empire and who made substantial contributions in the fields of aviation and film making, purchased most and, eventually, all of the former Playa Vista Planning Area. Hughes initially acquired Playa Vista to make movies. Later, he used the property for the construction of an aircraft plant to consolidate his aviation interests in southern California into one large facility. This plant, referred to as the “Culver City” plant and the “Hughes Aircraft site,” was constructed east of the Proposed Project site within the Playa Vista First Phase Project site. A small portion of the plant site, including two structures, extends into the Proposed Project site.

In the 1960s, the small craft harbor of Marina del Rey was constructed north of Hughes’ property adjacent to the Ballona Flood Control Channel. Centinela Creek Flood Control Channel, north and east of Hughes’ property, was also constructed in the early 1960s by the U.S. Army Corps of Engineers in cooperation with the Los Angeles Flood Control District.<sup>565-566</sup>

In 1984, McDonnell Douglas Corporation purchased Hughes Helicopter and leased that portion of the Plant Site that is located within the Project site. Both McDonnell Douglas and Hughes Helicopter vacated the Playa Vista Property in 1994.

### **2.2.2 Cultural Resource Surveys**

Many prehistoric sites have been found in the Ballona region over the last 60 years. Much of the area has been professionally surveyed, with excavations undertaken at sites on the Del Rey Hills north of Playa Vista, along Centinela Ditch within the Playa Vista First Phase

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<sup>565</sup> *Kruska, G., Evergreen Air Center, Inc., Marana, Arizona, personal communication, July 31, 1990.*

<sup>566</sup> *Tweten, J.F., formerly of Hughes Aircraft, retired, Culver City, California, personal communication July 13, 1990.*

Project and Proposed Project areas, and on the edge of the historical Ballona Lagoon north of Playa Vista. Within a mile radius of Playa Vista, the locations of more than 25 archaeological sites are currently on file at the South Central California Information Center at California State University, Fullerton. The majority of the sites are either located on the top or at the base of the Del Rey Hills, with a scattering of sites situated on the northern edge of the historical Ballona Lagoon along Ballona Creek or on the open coast. Archival research suggests that other sites might be located in the surrounding area that would contribute to a better understanding of the prehistoric and historical cultural heritage of the area.

Archaeological sites in and around the Project site were visited by collectors and amateur archaeologists beginning in the 1930s. Malcolm Farmer, working in the 1930s, and William Dean, active in the late 1940s and early 1950s, noted an archaeological site later designated as CA-LAN-62 by Stuart Peck of the Southwestern Museum. Peck found inhumations (burials) and cremations as well as a variety of artifacts. All materials recovered by Peck are deposited with the Southwest Museum.

In 1950, Charles Rozaire and Russell Belous, who were then undergraduates at UCLA, visited and recorded 23 sites in the Ballona area. In 1979, R.L. Pence was contracted by the Summa Corporation to conduct a reconnaissance level survey of the entire Playa Vista Planning Area. Pence's survey was cursory in nature; not all areas were examined. Pence briefly describes 17 sites, 16 of which had been previously surveyed. Among those described were CA-LAN-62 within the Proposed Project site. In the 1980s, further investigations were performed under the direction of Dr. David Van Horn including data recovery of sites on the bluff tops and to conduct test excavations of CA-LAN-62 and CA-LAN-211.

In 1990, Statistical Research, Inc. (SRI) conducted a systematic pedestrian survey of the entire area covered by the Programmatic Agreement. According to the survey, the various episodes of construction and fill that have occurred over the Playa Vista site have greatly hampered the visibility and evidence of cultural resources that may have once been exposed. In response, there has been ongoing research to discover and evaluate buried archaeological sites on lands within the area subject to the Programmatic Agreement.

Five Archaeological Treatment Plans (ATPs) have been implemented by SRI, and approved by the USACE, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation. Of these, one is for a site located within the Proposed Project area and the remaining four are for off-site locations in the vicinity of the Proposed Project. The ATP within the Proposed Project site was prepared in 1991 and involved CA-LAN-62 and CA-LAN-211. Subsequently, it was found that as previously defined, CA-LAN-62 and CA-LAN-211 were one large site. This combined site is now referred to as CA-LAN-62. The designation CA-LAN-211 was reused for another archaeological site in the Proposed Project site. A new ATP has been prepared for the newly designated site, CA-LAN-211/H, and is currently under review by the

USACE, the State Historic Preservation Officer, the Advisory Council on Historic Preservation and two groups representing the Gabrielino Indians.<sup>567</sup>

If additional archaeological sites are found, the USACE will determine the eligibility of unevaluated archaeological properties in consultation with the State Historic Preservation Officer and in accordance with the Programmatic Agreement. As appropriate, ATPs will then be developed, which will include details for dealing with properties discovered during the implementation of the Proposed Project.

### **2.2.3 Archaeological Resources on the Proposed Project Site**

Under the research program implemented by SRI, for the area subject to the Programmatic Agreement, 22 loci of cultural materials have been identified. Of these 22 loci, four are fully or partially located within the Proposed Project site. These four loci are described in Table 183 on page 1213.

Under the Research Design some of the archaeological sites on the Proposed Project site as well as throughout the Ballona region have been evaluated as eligible for listing in the National Register of Historic Places as an historic district. This district has been named the Ballona Lagoon Archaeological District. Sites formally recorded within the proposed district (recorded at UCLA and/or the South Central Coast Information Center) that are included in or overlap a portion of the Proposed Project site include CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769.

All of the sites are archaeological in nature. One of the sites also includes concentrations of historical cultural material that was redeposited (CA-LAN-1932H). Only CA-LAN-62 and CA-LAN-211/H have been recommended to be eligible for the National Register.

With the formal determination of National Register eligibility of the Ballona Lagoon Archaeological District, this District is also listed in the California Register. Therefore, the sites included within the District are also historical archaeological resources for purposes of CEQA. Based on the archaeological evaluations undertaken by SRI, beyond the sites within the District, no other potential archaeological site within the Project site is eligible for the California Register as an historical archaeological resource.

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<sup>567</sup> Altschul, J.H., *Statistical Research, Personal communication, July 16, 2003.*

**Table 183**

**CULTURAL SITES WITHIN THE PROPOSED PROJECT**

<b>Permanent No.</b>	<b>Description</b>	<b>Site Size (in meters)</b>	<b>Depth of Deposits</b>	<b>Artifacts</b>	<b>Human Remains Present</b>	<b>Shell</b>	<b>Status</b>
CA-LAN-1932H	historic trash deposit	480 x 30	undetermined	earthenware ironstone porcelain clear, green and brown glass	No	none	Not Eligible <sup>a</sup>
	shell midden	100 x 50	30 cm	lithic debitage shell beads misc. animal bone	No	Chione sp. Augopecten sp. Ostrea lurida	Not Eligible
CA-LAN-2769	shell scatter	90 x 3	undetermined	debitage stone bowl fragment	No	Chione californiensis Chione undatella Protothaca staminea Ostrea lurida	Not Eligible, secondary deposit
CA-LAN-211/H	shell midden	75 x 3	lmt	debitage, mortar projectile points, shell and glass beads, misc. animal bone	No	Chione californiensis misc. unidentifiable fragments	Eligible <sup>b</sup>
CA-LAN-62	shell midden	45 x 30	undetermined	debitage cores, shell beads, projectile points, misc. animal bone present	Yes	Trachycardium quadrangenarium Haliotis cracherodii Chione californiensis Chione undatella Chione fluctafraga Pecten sp. Ostrea lurida Protothaca staminea	Eligible <sup>b</sup>

<sup>a</sup> Determined not eligible for listing on the National Register.

<sup>b</sup> Determined eligible for listing on the National Register.

Source: Statistical Research, Inc., October 2002.

Previous work has demonstrated that data retrieved from these sites can be used to address many of the questions listed under the historical context themes, human-land relationships and cultural history and cultural dynamics. Specifically, the test excavations at CA-LAN-62, 211/H, and 1932H have recovered faunal and subsistence related remains in substantial numbers. Based on artifacts recovered, many of these sites appear to be multicomponent, dating from at least 3,000 years ago, until the early 1800s.

Only CA-LAN-62 and CA-LAN-211/H are intact. CA-LAN-1932H represents fill taken most likely from CA-LAN-211/H to level the runway. Preservation is generally excellent as evidenced by bone and shell recovered during the test excavations. The sites have yielded large quantities of floral, faunal, and shell remains from intact deposits from which research questions relating to prehistoric subsistence can be addressed; adequate samples of projectile points, shell beads, obsidian artifacts, charcoal, shell, and bone to investigate chronological questions; sufficient quantities of microliths to investigate the technology of these peculiar Ballona lithic industries; and substantial numbers of diagnostic artifacts, such as projectile points, shell beads, and historic trade goods (if present) to examine questions of cultural affiliation. These sites, therefore, are considered contributing members of the district.

Human remains have been found at CA-LAN-62. As per the California Health and Safety Code Section 7050.5 and Public Resources Code 5097.98, the Native American Heritage Commission designated a Most Likely Descendant. SRI has been coordinating with the Most Likely Descendant according to State statutes. The Most Likely Descendant has provided a written protocol for the excavation of human remains which SRI is implementing.<sup>568</sup>

### 3.0 IMPACT ANALYSIS

#### 3.1 Methodology

The Research Design contained in the Cultural Resources Technical Report, Appendix O-4 of the EIR, was developed to identify and evaluate archaeological and historical resources and to address federal laws including, but not limited to, the National Historic Preservation Act, NEPA, Archaeology and Historic Preservation Act, and regulations set forth in the California Environmental Quality Act (CEQA).

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<sup>568</sup> *Altschul, J.H., Statistical Research, Personal communication, July 16, 2003.*

The archaeological resources Research Design,<sup>569</sup> includes an intensive pedestrian survey of the Proposed Project site. The Research Design also compiles all published and unpublished materials pertaining to archaeological resources in the Marina del Rey area, establishes historic contexts for evaluating the significance of archaeological resources; and develops a program for the mitigation of impacts on significant archaeological resources resulting from the proposed development. The Research Design reflected review and input from all relevant governmental agencies, a peer review panel, and interested Native American groups.

### 3.2 Significance Threshold

The Draft City of Los Angeles CEQA Guidelines (p. M.2-3) state that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting is found to be important under the criteria of CEQA because it:

- (1) Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- (2) Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- (3) Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- (4) Is at least 100-years-old<sup>570</sup> and possesses substantial stratigraphic integrity; or
- (5) Involves important research questions that historical research has shown can be answered only with archaeological methods.

Based on these factors, the Proposed Project would have a significant impact on archaeological resources if:

- Project activities would disturb, damage, or degrade a unique archaeological resource or an archaeological historic resource, or setting of the resource.

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<sup>569</sup> *Statistical Research, "Playa Vista Archaeological and Historical Project Research Design," 1991. The pedestrian survey addressed all of the former, 1,086-acre Playa Vista Planning Areas.*

<sup>570</sup> *As noted in the Draft LA CEQA Thresholds Guide (p. M.2-12, fn. 3), although the CEQA criteria state that "important" archaeological resources are those which are at least 100-years-old, the California Register provides that any site found eligible for nomination to the National Register will automatically be included within the California Register and subject to all protections thereof. The National Register requires, except in exceptional circumstances that resources be at least 50-years-old.*

### 3.3 Project Design Features

As noted above, the Proposed Project is subject to the stipulations set forth in a Programmatic Agreement. The Programmatic Agreement was entered into among the U.S. Army Corps of Engineers, the Advisory Council on Historic Preservation, and the State Historic Preservation Officer in September 1991, with the participation of the Applicant and two groups of local Native Americans of Gabrielino descent. The Programmatic Agreement, incorporates the U.S. Army Corps of Engineers determination that the Playa Vista development would have an effect on properties included in, or eligible for, the National Register. The Programmatic Agreement specifies that development of the Playa Vista Property shall be administered in accordance with specific terms and conditions in order to take into account the effects of the Project on archaeological resources or historical properties. The following provisions of the Programmatic Agreement are applicable to the Proposed Project.

The Programmatic Agreement assures that the permit which authorized the fill of wetlands on the Proposed Project site will be administered in accordance with the requirements of the Playa Vista Research Design.

The Programmatic Agreement also identifies the area and sites that were known at the time of signing, includes measures that ensure these sites are protected, and includes, among other provisions, the following:<sup>571</sup>

- The U.S. Army Corps of Engineers shall determine the eligibility of unevaluated historical properties in consultation with the State Historic Preservation Officer and in accordance with 36 CFR 800.4 (c). In addition, the Project “Research Design” which has been developed in consultation with the U.S. Army Corps of Engineers and the California State Historic Preservation Officer, would guide the evaluation of the historical properties. Treatment Plans shall be developed based on these evaluations.
- The U.S. Army Corps of Engineers shall ensure that an Archaeological Treatment Plan is developed in consultation with the State Historic Preservation Office for all historical properties within the Project’s Area of Potential Effect, that are determined to be eligible for the National Register in accordance with the following stipulations. See Appendix O-4 of the Cultural Resources Technical Appendices.
  - The Archaeological Treatment Plan for the Project shall be consistent with the Secretary of the Interior’s Standards and Guidelines for Archaeological Documentation (48 FR 44734-37), the California Office of Historic Preservation’s

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<sup>571</sup> *The status of these sites is described in detail in Volume II, and below under Section 2.4.1 Project Buildout.*

(COHP) Archaeological Resources Management Reports (ARMR): Recommended Contents and Format (1989) and Guidelines for Archaeological Research Designs (1991), and take into account the Advisory Council on Historic Preservation publication, Treatment of Archaeological Properties – A Handbook. It shall also be consistent with the Department of the Interior’s Guidelines for Federal Agency Responsibility Under Section 110 of the National Historic Preservation Act (53 FR 4727-46).

- Archaeological Treatment Plans for the Project will be developed and implemented prior to the commencement of ground-disturbing activities in the Areas of Potential Effect.
- If cultural deposits are discovered during the Project’s land-disturbing activities, the Project Applicant would treat them in accordance with the provisions of the Archaeological Treatment Plan. If cultural deposits are discovered for which there is no treatment plan, the Project Applicant will cause a temporary halt to these activities and immediately notify the U.S. Army Corps of Engineers, the State Historic Preservation Officer and the Advisory Council on Historic Preservation of the discoveries. The U.S. Army Corps of Engineers shall ensure that a plan is developed for treating the unexpected discovery.
- The U.S. Army Corps of Engineers shall ensure that all materials and records resulting from implementation of this agreement are curated in accordance with 36 CFR Part 79. This regulation establishes definitions, standards, procedures, and guidelines to be followed by federal agencies to preserve collections of prehistoric and historic materials, remains, and associated records.
- All plans prepared under the Programmatic Agreement shall include a schedule for the submission and review by the U.S. Army Corps of Engineers, and the State Historic Preservation Officer of technical reports, progress reports, and the methods by which all parties, including interested Native Americans, would be kept informed.

### **3.4 Project Impacts**

#### **3.4.1 Proposed Project Impacts**

The significance threshold for Archaeological Resources is based on consideration of both the threshold described in the Draft Los Angeles CEQA Thresholds Guide (p. M.2-3) (Guide) and provisions of CEQA. The recommended threshold in the Guide (see Subsection 3.2, above) includes two components. The first threshold component identifies effects that could cause an impact: “...if (the project) could disturb, damage, or degrade an archaeological resource



or its setting....” That portion of the language in the Guide has been incorporated directly into the threshold.

The second threshold component identifies the resources that are of concern. Per the Guide, a resource can be significantly impacted if it is found to be important under the criteria of CEQA because it: (1) is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory; (2) provides information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions; (3) has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; (4) is at least 100 years old and possesses substantial stratigraphic integrity; or (5) involves important research questions that historical research has shown can be answered only with archaeological methods. These factors have been taken into consideration in the significance threshold which incorporates Section 21083.2(g) of the Public Resources Code and Section 15064.5(a) of the CEQA guidelines. The threshold addresses impacts on “unique archaeological resources or their settings, or an archaeological historical resource.”

The City’s five attributes are assumed to be “unique archaeological resources.” Use of the term “unique archaeological resource” in the significance threshold incorporates a term defined in Section 21083.2(g) of the Public Resources Code. Section 21083.2(g) defines three attributes that contribute to a resource being classified as unique. These three attributes are substantially similar to the City’s first three attributes. The remaining two City attributes are more far reaching than those defined in Public Resources Code Section 21083.2(g).

Use of the term “archaeological historical resource” in the significance threshold incorporates a concept presented in Section 15064.5(a) of the State CEQA Guidelines that addresses archaeological resources that are also classified as historical resources. As described in Section 15064.5(b)(1), “Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resources or its immediate surrounding such that the significance of an historical resource would be materially impaired.” These criteria are included within the portion of the significance threshold used in this analysis that addresses the disturbance, damage, or degradation of historical resources.

Both the Urban Development and Habitat Creation/Restoration components of the Proposed Project include activities that would cause earth disturbance in areas that may contain cultural resources. As such the following discussion pertains to the Project as a whole.

As summarized in Table 183 on page 1213, several of the sites analyzed to date are fully or partially located on the Proposed Project site. The Proposed Project site contains cultural loci CA-LAN-1932H (historical period trash dump and redeposited shell midden), CA-LAN-2769

(shell scatter), CA-LAN-211/H (shell midden), and CA-LAN-62 (shell midden). Of these cultural loci, CA-LAN-211/H, and CA-LAN-62 have been identified as potentially significant cultural resources. These loci were tested and CA-LAN-62 has been determined to be eligible for listing in the National Register and CA-LAN-211/H is under review. CA-LAN-2769 and CA-LAN-1932H have been tested, and are not recommended to be eligible for listing in the National Register.

Under the California Register statute, any California resource formally determined eligible for listing in the National Register of Historic Places is automatically listed in the California Register.<sup>572</sup> Therefore, those archaeological sites within the Project site that have been determined eligible for the National Register under the Programmatic Agreement are also listed in the California Register and are historical archaeological resources for purposes of CEQA.

In designing the riparian corridor, the Project applicant along with regulatory agencies including the City of Los Angeles, the Corps of Engineers, the State Historic Preservation Office, and the Advisory Council on Historic Preservation, considered the impacts of the project element on cultural resources. The design ensures that sections of the significant archaeological sites along the bluffs are preserved. These will be protected within the open space designated as part of the riparian corridor. The corridor itself, however, cannot be placed in such a way as to avoid all portions of these archaeological sites and still function as a hydraulic feature.

For these reasons, the only feasible mitigation measure in those portions of the significant archaeological sites that will be adversely impacted by the riparian corridor is data recovery. The extent and nature of data recovery along with other mitigation measures for portions of the sites that will not be impacted by construction are set forth in the Research Design and Archaeological Treatment Plans for CA-LAN-62 and CA-LAN-211/H.<sup>573</sup>

As these sites have been discovered, and are being scientifically evaluated and treated per the required protocols, any potential impacts from Proposed Project activities on these sites will have been mitigated prior to the onset of Project construction.

Significant direct impacts to archaeological resources within the Proposed Project site could result from construction-related excavation/grading activities that disturb or destroy archaeological sites and artifacts, or encourage unauthorized collection of artifacts by souvenir hunters.

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<sup>572</sup> *Public Resources Code Section 5024.1.*

<sup>573</sup> *Altschul, Jeffrey, H., et al., Playa Vista Archaeological and Historical Project, At the Base of the Bluff, Archaeological Inventory and Evaluation along Lower Centinela Creek, Marina del Rey, California. Statistical Research, Inc. Tucson, AZ, Redlands, CA, April 2003.*

The potential for loss of cultural resources and information could be significant if any archaeological or historical resources were disturbed or removed without an analysis of their cultural significance or without documentation of their context in relation to the surrounding environment. In addition, disturbances of burial remains or associated artifacts could result in significant impacts to these cultural resources for Native Americans.

Other Proposed Project activities might not directly disturb archaeological resources, but could produce indirect significant adverse impacts through placement of buildings or other structures which preclude access to, and scientific investigations of, unknown resources. Acceptable archaeological techniques for avoiding archaeological sites are available to reduce or eliminate impacts by burying or “capping” sites to preserve the cultural material. It should be noted, however, that archaeological deposits are lying in compacted and, in some cases, contaminated soils. Archaeological resources kept in place in contaminated and compacted soils could also incur damage by remaining in such conditions.

As described above, an ongoing research program has been occurring within the Proposed Project site and its environs. Based on the work-to-date, a large amount of artifacts have been discovered and analyzed, and archaeological sites have been identified. Nonetheless, there is a potential for new discovery.

As described in the Project Design Features, encountered resources would be evaluated and treated per the protocols established in the Programmatic Agreement and ATP for CA-LAN-62 and CA-LAN-211/H. Such evaluation and treatment would allow for scientific discovery and contributions to the body of knowledge regarding California and American prehistory and history. The evaluation and treatment undertaken pursuant to these requirements would preclude, through approved and required mitigation techniques, significant impacts from the disturbance, damage or degradation of unique archaeological resources, or archaeological historic resources that may be encountered. With the implementation of the Project Design Features impacts would be reduced to a less-than-significant level. Mitigation Measures are proposed below to require implementation of the Project Design Features.

### **3.4.2 Equivalency Program Impacts**

The preceding analysis of potential impacts on archaeological resources addressed the following issues: (1) destruction of resources; (2) exposure of resources to unauthorized collection; and (3) limiting access to resources. Such impacts could occur as a result of site preparation activities (e.g., excavation) or the placement of buildings within the Project site.

The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the

Project site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations, building pad elevations, or the depth of excavation. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the proposed earth moving activities and their associated impacts because all that is changing is the type of use occupying a building.

All of the recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, below) to minimize impacts on archaeological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as with the Proposed Project, and the mitigation measures would be the same, potential impacts on archaeological resources would be the same. Thus, implementation of the Equivalency Program, as is the case with the Proposed Project, would not result in a permanent loss of, or loss of access to, archaeological resources, and impacts would be less than significant.

### 3.4.3 Impacts of Off-Site Improvements

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue.

No impacts are expected to occur to archaeological resources. Excavation for the off-site improvements would be surficial and located in previously disturbed areas. All of the off-site improvements except the water regulator station occur within or adjacent to existing roadways. The water regulator station would include a small amount of piping equipment that would most likely be located just above ground. Excavation would be required to the depth of the existing main water line.

Further, no archaeological resources are known to occur at any of the off-site locations. An archaeological records search was performed to identify potential resources in the area of the proposed improvements.<sup>574</sup> The records search did not identify any resources that would be affected. One of the reports identified in the search pertains to the monitoring of previous construction activities involving the median between North Culver and South Culver Boulevard,

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<sup>574</sup> "Records Search Request for Seven Areas Located in Venice, Inglewood, and Beverly Hills Quadrangles, Los Angeles County, California," South Central Coastal Information Center, California Historical Resources Information System, UCLA Institute of Technology

which is also the location of two of the Proposed Project's roadway widenings. No resources were encountered during the previous construction of the median. The roadway widenings along the median would merely rework the previously disturbed areas.

Notwithstanding, the City of Los Angeles "Standard Specifications for Public Works Construction," Section 6-3.2 requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures. If such a resource were encountered, within the City of Los Angeles, Public Works Section 6-3.2 would be applied. Therefore, none of the off-site improvements would result in significant impacts, unto themselves, nor would the off-site improvements, in combination with the Proposed Project result in a significant impact.

#### **4.0 MITIGATION MEASURES**

##### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to the issuance of any grading/excavation or building permits, the measures required within the approved Archaeological Treatment Plans for the properties designated as LAN-211/H and LAN-62, which have been determined eligible for listing in the National Register of Historic Places and accepted by the U.S. Army Corps of Engineers, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation shall be implemented. The archaeological treatment plans shall be consistent with the following: the Secretary of Interior Guidelines for Archaeological Documentation; the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format, and Guidelines for Archaeological Research Designs; the Department of the Interior's Guidelines for Federal Agency Responsibilities under Sections 106 and 110 of the National Historic Preservation Act; and take into account the Council's publication, Treatment of Archaeological Properties – A Handbook.
- Prior to issuance of grading/excavation or building permits, a professional archaeologist shall be retained that meets the Secretary of Interior's guidelines and is listed in the Register of Professional Archaeologists to implement the Research Design and comply with the Programmatic Agreement.
- Historic resources eligible for listing in the National Register of Historic Places shall be avoided or unavoidable disturbance be mitigated through data recovery, documentation, analysis, and curation. Archeological treatment plans required by the Programmatic Agreement shall be developed and implemented, as applicable. All

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materials and records resulting from implementation of the Programmatic Agreement shall be curated in accordance with 36 Code of Federal Regulations Part 79.

- In addition to a qualified archaeologist, a representative of the Gabrielino Indians shall be retained to monitor subsurface archaeological excavations. Prior to issuance of grading or building permits, evidence shall be provided for placement in the subject file with the City Planning Department that a Native American monitor has been retained.
- In the event that previously unknown archaeological and historical resources are discovered during construction, grading/excavation/construction shall temporarily be halted. The U.S. Army Corps of Engineers and the State Historic Preservation Officer shall immediately be notified to provide these agencies with the opportunity to assess the resources and offer recommendations for treatment required by the Programmatic Agreement.
- The Project archaeologist shall monitor ground disturbing activities in areas where significant archaeological or historical materials are discovered or detected. If cultural resources are discovered during grading/excavation/construction monitoring, such resources shall be evaluated for their eligibility for listing in the National Register of Historic Places. If potentially significant resources are encountered, a letter of notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading. If eligible, an archaeological treatment plan shall be developed and implemented in accordance with the Programmatic Agreement.
- Following completion of grading activities, a qualified archaeologist, who meets the Secretary of Interior Guidelines and is listed in the Register of Professional Archaeologists, shall prepare a report of the results of archaeological investigations to the City of Los Angeles Department of City Planning, other appropriate public agencies, and concurring parties as specified in the Programmatic Agreement. The report shall be submitted to the above parties according to the schedules established in the respective ATPs.
- If a commemorative display center for items of cultural significance should be provided in the Playa Vista First Phase Project, representative artifacts from the Proposed Project site, should they be discovered, or accurate replicas shall be made available for the display at the display center.

## 5.0 UNAVOIDABLE ADVERSE IMPACTS

The impact analysis identified several potential direct and indirect adverse impacts on archaeological or historical resources associated with excavation and incidental unauthorized collecting. These impacts would be similar under both the Proposed Project and the Equivalency Program. Encountered resources would be evaluated and treated per the protocols established the Programmatic Agreement and related Archaeological Research Design. Such evaluation and treatment would allow for scientific discovery and contributions to the body of knowledge regarding California and/or American prehistory and history. The evaluation and treatment undertaken pursuant to these requirements would preclude, through approved and required mitigation techniques, significant impacts from the disturbance, damage or degradation of unique archaeological resources or archaeological historic resources that may be encountered. With the implementation of the Programmatic Agreement and mitigation measures listed above, impacts for the Proposed Project and Equivalency Program would be reduced to a less-than-significant level. No adverse impacts on archaeological resources are expected from the construction of the Project's off-site improvements.

## 6.0 CUMULATIVE IMPACTS

Development of the Proposed Project, inclusive of the Equivalency Program and the construction of the off-site improvements, in combination with the related projects, could contribute to the cumulative loss of cultural (archaeological and historical) resources within the region, city, and state as a whole. All potential sites are required to be evaluated prior to construction activities. Depending on the outcome of these evaluations, there could be possible effects on cultural (archaeological and historical) resources.

Related Project #24, the Catellus project on the West Bluffs, is developing an area where several archaeological sites are located. These sites have been known since the 1930s, and previous data recovery has mitigated the loss of information associated with these two sites. Recent monitoring during grading activities has uncovered a variety of cultural resources, including human remains, which are being dealt with in accordance with the mitigation measures adopted for that project and applicable federal and state regulations.

At the same time, construction activity conducted under regulations often provides a vehicle for preservation of historic structures and discovery of new archaeological resources that would otherwise remain unknown. To the extent individual related projects would be required to comply with applicable laws, the potential disturbance, damage or degradation of unique archaeological resources, or archaeological historic resources could be mitigated. The cumulative total of all related project development creates the potential for additional impacts upon archaeological resources. Although each project must develop adequate mitigation measures to

substantially lessen or avoid impacts on an individual basis, the incidental loss of all project-study area archaeological resources may constitute a significant cumulative impact.



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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**P. CULTURAL RESOURCES**  
**(3) HISTORIC RESOURCES**

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**1.0 INTRODUCTION**

This section addresses the Proposed Project's impacts on historic resources. The analysis identifies and evaluates buildings and structures located within the Project site to determine whether they are historic resources, and if so determined, whether they may be affected by implementation of the proposed development. The analysis also assesses the potential for Project development to affect any off-site historic resources. The information in this section is based on a Historic Assessment Memorandum, prepared by Historic Resources Group (HRG) for the Proposed Project.<sup>575</sup> The analysis addresses the impacts that would occur for the Project as Proposed, for the Project's Equivalency Program and for the Project's secondary impacts that would occur from the implementation of the Project's off-site mitigation measures.

**2.0 ENVIRONMENTAL SETTING**

**2.1. Regulatory Framework**

Numerous laws and regulations require federal, state, and local agencies to consider the effects of a proposed project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g., State Historic Preservation Office and the Advisory Council on Historic Preservation). The National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources, Public Resources Code (PRC) 5024, are the primary federal and state laws governing and affecting preservation of historic resources of national, state, regional, and local significance. Additional regulations may include the U.S. Secretary of the Interior's Standards for Rehabilitation of Historic Buildings, the Americans With Disabilities Act, the California State Historical Building Code, and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Municipal Code, Sections 22.120, et. seq.).

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<sup>575</sup> *Historic Resources Group, (HRG), Memorandum re: Historical Assessment of Playa Vista site, May 2, 2003.*

## 2.1.1 Federal Level

### 2.1.1.1 National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the National Historic Preservation Act of 1966, as “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>576</sup> The National Register recognizes properties that are significant at the national, State and local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must meet one or more of the following four established criteria:<sup>577</sup>

1. Are associated with events that have made a significant contribution to the broad patterns of our history;
2. Are associated with the lives of persons significant in our past;
3. 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
4. Have yielded, or may be likely to yield, information important in prehistory or history

Unless the property possesses exceptional significance, it must be at least 50 years old to be eligible for National Register listing.<sup>578</sup>

In addition to meeting the criteria of significance, a property must have integrity. Integrity is understood as “the ability of a property to convey its significance.”<sup>579</sup> The National

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<sup>576</sup> *Code of Federal Regulations (CFR), 36 Section 60.2.*

<sup>577</sup> *U.S. Department of the Interior, National Park Service, National Register Bulletin: How to Apply the National Register Criteria for Evaluation (Washington, DC: National Park Service, 1995).*

<sup>578</sup> *As defined by National Register Criteria Consideration G: Properties That Have Achieved Significance Within the Last Fifty Years, National Register Bulletin: How to Apply the National Register Criteria for Evaluation. Additional information on Criteria Consideration G may be found in National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years.*

Register recognizes seven qualities that, in various combinations, define integrity. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.<sup>580</sup> The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

### **2.1.1.2 Section 106 Review Process**

Section 106 of the National Historic Preservation Act (Section 106) requires Federal agencies with jurisdiction over federally assisted undertakings (projects) to take into account the effects of such projects on properties which are listed in or eligible for listing in the National Register. A process which provides an independent reviewing agency, the Advisory Council on Historic Preservation (ACHP), an opportunity to comment, must be completed. The purpose of Section 106 is to avoid unnecessary harm to historic properties from Federal actions. Now commonly known as Section 106 review, the procedure for meeting Section requirements is defined in regulations of the ACHP “Protection of Historic Properties” (36 CFR Part 800). The Section 106 review involves five steps: identification and evaluation of historic properties; assessment of the effects of the proposed project; consultation with the State Historic Preservation Officer (SHPO); and other interested parties; ACHP comment; and proceeding with the project, either with a Memorandum of Agreement amongst the consulting parties or taking into account the Advisory Council’s comments.

### **2.1.2 State Level**

The State implements the NHPA through its statewide comprehensive resource surveys and preservation programs. The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State’s jurisdictions.

#### **2.1.2.1 California Register of Historical Resources**

Created by Assembly Bill 2881 which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the

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<sup>579</sup> *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, p. 44.

<sup>580</sup> *National Register Bulletin How to Apply the National Register Criteria for Evaluation*, p. 44.

existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>581</sup> The criteria for eligibility for the California Register are based upon National Register criteria.<sup>582</sup> Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.<sup>583</sup>

A resource must meet one or more of the following criteria for listing on the California Register of Historical Resources:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

Resources eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

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

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 770 onward.

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<sup>581</sup> *California Public Resources Code Section 5024.1(a).*

<sup>582</sup> *California Public Resources Code § 5024.1(b).*

<sup>583</sup> *California Public Resources Code § 5024.1(d).*

- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources which may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5.<sup>584</sup>
- Individual historical resources.
- Historical resources contributing to historic districts.
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

#### **2.1.2.2 California Environmental Quality Act (CEQA)**

Under CEQA, a “project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”<sup>585</sup> This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historical resource. If so, then the second part involves determining whether the project may involve a “substantial adverse change in the significance” of the historical resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted in final form on October 26, 1998 with the addition of CEQA Guidelines Section 15064.5. The new CEQA Guidelines provide that for the purposes of CEQA compliance, the term “historical resources” shall include the following:<sup>586</sup>

- “A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public

<sup>584</sup> Office of Historic Preservation National Register Status Codes proscribed in OHP’s “Instructions for Recording Historical Resources, 1995.” Categories 3 through 5 involve various levels of National Register, California Register, and/or local jurisdiction eligibility.

<sup>585</sup> California Public Resources Code Section 21084.1, added in 1992 by AB 2881.

<sup>586</sup> State CEQA Guidelines, 14 CCR Section 15064.5(a).

agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

The current CEQA Guidelines state that a project involves a "substantial adverse change" when one or more of the following occurs:

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.<sup>587</sup>
- The significance of a historical resource is materially impaired when a project:<sup>588</sup>
  - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
  - Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of

<sup>587</sup> *State CEQA Guidelines, 14 CCR Section 15064.5(b)(1).*

<sup>588</sup> *State CEQA Guidelines, 14 CCR Section 15064.5(b)(2).*

section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Additionally, in most circumstances, the Secretary of the Interior's Standards (Standards) are relevant in assessing whether there is a substantial adverse change under CEQA. The Standards are designed to ensure that rehabilitation does not impair the significance of a historic property. Section 15064.5(b)(3) of the CEQA Guidelines states in part that "...a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource."

### **2.1.3 Local level**

#### **2.1.3.1 City of Los Angeles Historic-Cultural Monuments**

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962, which defines Los Angeles Historic-Cultural Monuments (LAHCMs) for the City. According to the ordinance, LAHCMs are sites, buildings, or structures of particular historic or cultural significance to the City of Los Angeles in which the broad cultural, economic, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These LAHCMs are regulated by the City's Cultural Heritage Commission, which reviews permits to alter, relocate, or demolish these landmarks.

#### **2.1.3.2 City of Los Angeles Historic-Cultural Monuments Criteria**

The Los Angeles Cultural Heritage Ordinance (Sections 22.120, et seq. of the City of Los Angeles Municipal Code) establishes criteria for designating local historic resources as Los Angeles Historic Cultural Monuments (LAHCM). The City's criteria are sufficiently broad enough to include a wide variety of historic resources. However, a proposed resource should possess sufficient architectural, historical, and/or cultural significance to warrant designation. Though there is no age requirement for designation as a LAHCM, sufficient time to develop a

historical perspective and to evaluate its significance in context should be considered. A LAHCM must satisfy one or more of the City's criteria, which are defined as the following:

- It reflects or exemplifies the broad cultural, political, economic, or social history of the nation, state, or community;
- It is identified with historic personages or with important events in the main currents of national, state, or local history;
- It embodies certain distinguishing characteristics of an architectural type, specimen, inherently valuable for a study of a period style or method of construction; and/or
- It is notable work of a master builder, designer, or architect whose individual genius influenced his age.

### **2.1.3.3 City of Los Angeles Historic Preservation Overlay Zones**

Additionally, the City of Los Angeles provides for the identification and designation of Historic Preservation Overlay Zones (HPOZ) under the LAMC, Section 12.20.3. HPOZs are essentially locally designated historic districts or groupings of historic resources. To be significant, structures, natural features, or sites within a defined area as a whole should satisfy one or more of the following criteria:

- It has substantial value as part of the development, heritage or cultural characteristics of the life of a person important in the history of the city, state, or nation;
- It is associated with an event that has made a substantial contribution to the broad patterns of our history; or
- It is constructed in a distinctive architectural style characteristic of an era of history; and/or
- It is part of or related to a square, park or other distinctive area and should be developed or preserved according to a plan based on a historic, cultural, architectural, or aesthetic motif owing to its unique location or singular physical characteristics.

### **2.1.3.4 City of Los Angeles CEQA Thresholds Guidelines**

The City of Los Angeles has established its own CEQA Thresholds Guide to aid in identifying and evaluating historic resources which may be adversely impacted by a proposed



project. In identifying and evaluating a resource, a “yes” response to any of the following questions indicates a historic resource may be involved:

- Has the site been coded by the Department of Building and Safety with a Zoning Instruction (ZI) number in the 145 series (which indicates prior identification of the property as historic);
- Has the resource been designated by the City of Los Angeles as a Historic-Cultural Monument or as a contributor to an HPOZ;
- Is the resource included within the California Register maintained by OHP and ranked with an evaluation code of 1 (National Register listed resource) or 2 (determined eligible for listing in the National Register);
- Has the resource been classified as historic in an historical resources survey conducted as part of the updating of the Community Plan, the adoption of a redevelopment area or other planning project;
- Is the resource subject to other federal, state, or local preservation guidelines or restrictions;
- Does the resource have known associations with an architect, master builder, or person or event important history such that the resource may be of exceptional importance; and/or
- Is the resource over 50 years old and a substantially intact example of an architectural style significant in Los Angeles (age is calculated from an original building permit or the Land Use Planning and Mapping System maintained by the City Planning Department).

## **2.2 Existing Conditions**

### **2.2.1 Historic Context**

#### **2.2.1.1 History of the Local Region**

A detailed discussion of the historic context covering the Proposed Project site and local region is provided in Subsection 2.2 of Section IV.P.(2), Archaeological Resources. That discussion traces the history of the area from the earliest known occupation through the time in the 1990s when Howard Hughes/McDonnell Douglas Helicopter Company vacated the property prior to the onset of the development of the adjacent Playa Vista First Phase Project.

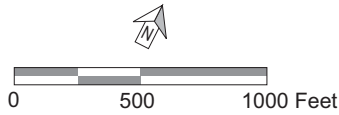
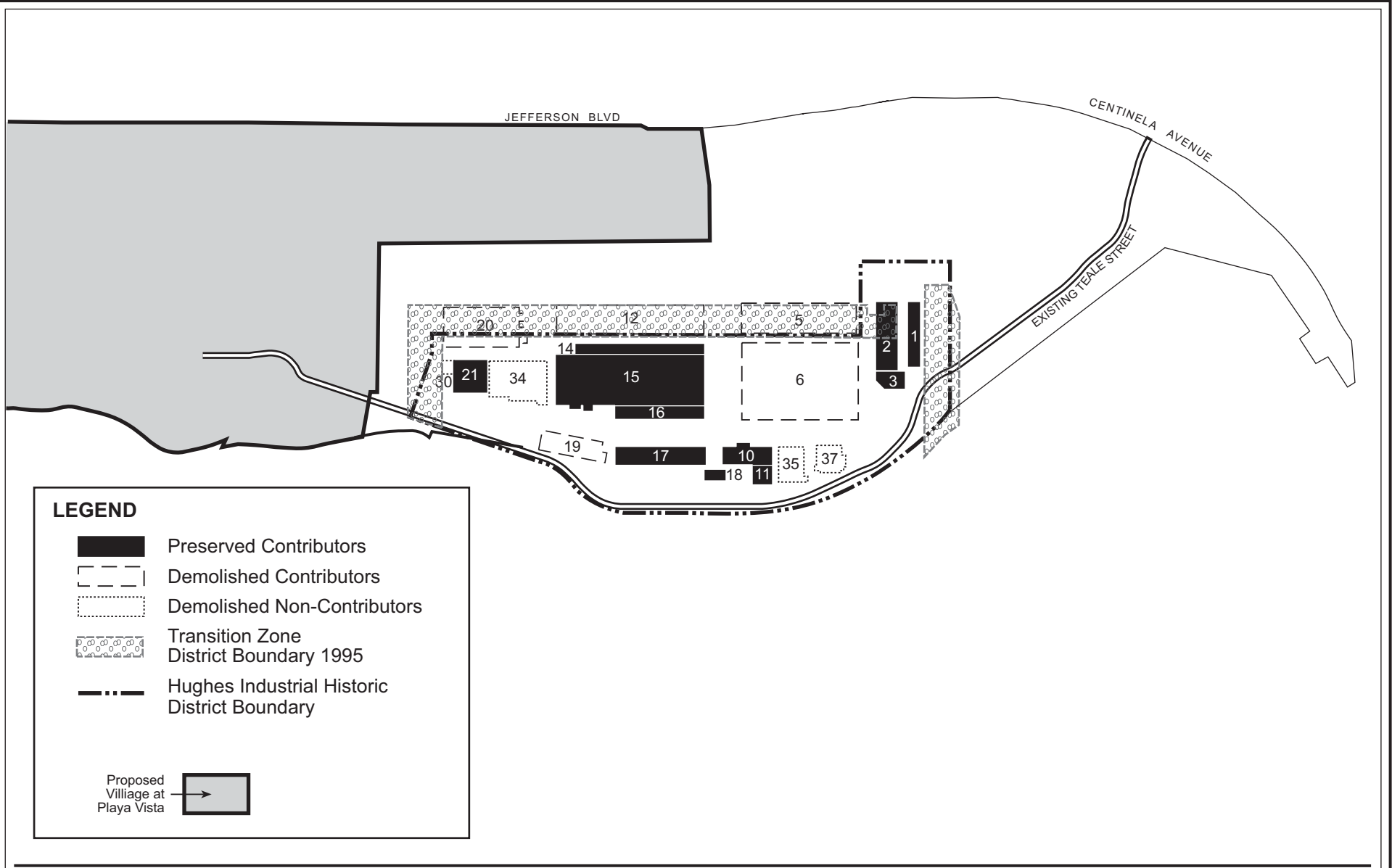
### **2.2.1.2 The Hughes Aircraft Company**

The Proposed Project is located within an area that was formerly part of the Hughes Aircraft Company site. Historically, the site has been referred to as the “Culver City Facility,” although the area has never been within the municipal boundaries of that city. The site is noteworthy, as it is a place where innovations in aviation technology have occurred. Specifically, during World War II, the company developed several innovative military aircraft components, such as flexible feed chutes for the B-17 Bomber and booster drives for machine guns. In addition, Hughes was designated the primary contractor for the design and production of three prototypes of “Flying Boats”, the most famous of which was nicknamed the “Spruce Goose.” Simultaneously, the company was responsible for the development of another experimental craft, the XF-11 photo-reconnaissance plane. In the late 1940s, Hughes Aircraft turned its attention from airplane design and production to electronics and guided missile design and the production of helicopters. While most of the buildings built in the complex’s period of significance (1941-1953) were utilitarian in appearance, some of the original buildings (the executive building, cafeteria, and fire station) were designed in a modern International Corporation style, as the site became the focal point of the burgeoning company.

The diversification of the company caused expansion of corporate offices, research labs and manufacturing plants into other parts of Southern California and Arizona. By 1983, Hughes Aircraft was the largest industrial employer in California, and the biggest employer in the Los Angeles area. It had become the nation’s largest defense electronics contractor, and the seventh largest overall Pentagon contractor.

### **2.2.2 Previous Historic Surveys and Evaluations**

Properties of potential historic significance within the Proposed Project site and the adjacent Playa Vista First Phase Project site were initially evaluated in a Historic Property Survey Report prepared in 1991. At that time, State Historical Resources Inventory Forms (DPR 523 forms) were prepared for several of the plant-site buildings, including Buildings 1-3, 5-6, 10-12, and 14-21, all of which are located outside of the Proposed Project site. The location of these buildings is illustrated in Figure 108 on page 1236. At that time, the identified National Register eligible Hughes Industrial Historic District boundaries were established. The Hughes Industrial Historic District was considered significant for having a distinct grouping of historic resources “of exceptional importance” in the context of aviation research and development in Southern California during World War II and the years which followed, a seminal period in the history of the industry and the area. While the site continued to contribute to aviation and avionics research and development, it was during this period of significance (1941-1953) that several advances were achieved including: the completion of the experimental photo-reconnaissance plane, the XF-11; the design and construction of the H-4 “Hercules”



Source: Historic Resources Group, July 2003

Figure 108  
**Hughes Industrial  
 Historic District**

experimental flying boat (the “Spruce Goose”); a large experimental helicopter, the XH-17 Sky Crane; and the research which resulted in Hughes’ first radar product for commercial airliners.

The majority of the buildings occupying the Hughes Aircraft site were constructed between 1941 and 1953. These buildings represent the company’s period of significance, the era in which the research and development activities began as a part of the war effort and led to continuous advances in aviation in the years that followed. The rest of the buildings were built between 1954 and 1988, and were to augment the functions of the main complex.

Buildings 22 and 45, which are located within the Proposed Project site, were included in the 1991 Historic Property Survey Report’s evaluation; however, State Historical Resources Inventory forms (DPR forms) were not prepared, since the buildings were not part of the Project analyzed at that time. Other buildings located within the Proposed Project site, Buildings 23, 910-913, 915, 923, and sheds along the west and north ends of the former Salvage Yard were not included in the 1991 evaluation. The locations of these buildings are shown on Figure 109 on page 1238.

During the Section 106 process conducted as part of the adjacent Playa Vista First Phase Project, the OHP raised questions regarding the boundaries of the identified historic district. These questions were resolved in a Determination of Eligibility Report prepared in 1995. Of the 22 buildings located on the plant site in 1995, two of which are located on the Project site, 16 were determined to be contributors to the Hughes Industrial Historic District. All of the 16 contributors are located outside of the Proposed Project boundaries, but are within the boundaries of the adjacent Playa Vista First Phase Project site. In coordination with this activity in 1995, DPR forms were prepared for Buildings 22 and 45, as they were part of the projects under consideration at that time (i.e., the Howard Hughes Industrial Historic District). These are the two buildings identified above as being located within the Proposed Project site. Complete discussions of the historic district boundaries are contained in the 1991 and 1995 reports, included in Appendix O-5 of the EIR.

### **2.2.3 Potential Historic Resources within the Proposed Project Site**

Each of the buildings located within the Proposed Project site (Buildings 22, 23, 45, 910, 911, 913, 915, 923, and the shed along the west side of the former Salvage Yard) evaluated in the current survey process were support facilities for the larger Hughes Aircraft Company complex. All of these buildings were initially used for storage purposes except for Building 45, a hangar, Building 22, a power plant and Building 23, a “test building.” Eventually, these buildings were also utilized as storage facilities. While a part of the overall facility, these buildings are all located outside of the identified Hughes Industrial Historic District. Buildings 22 and 45 were previously identified and evaluated as non-contributing buildings to the historic district because

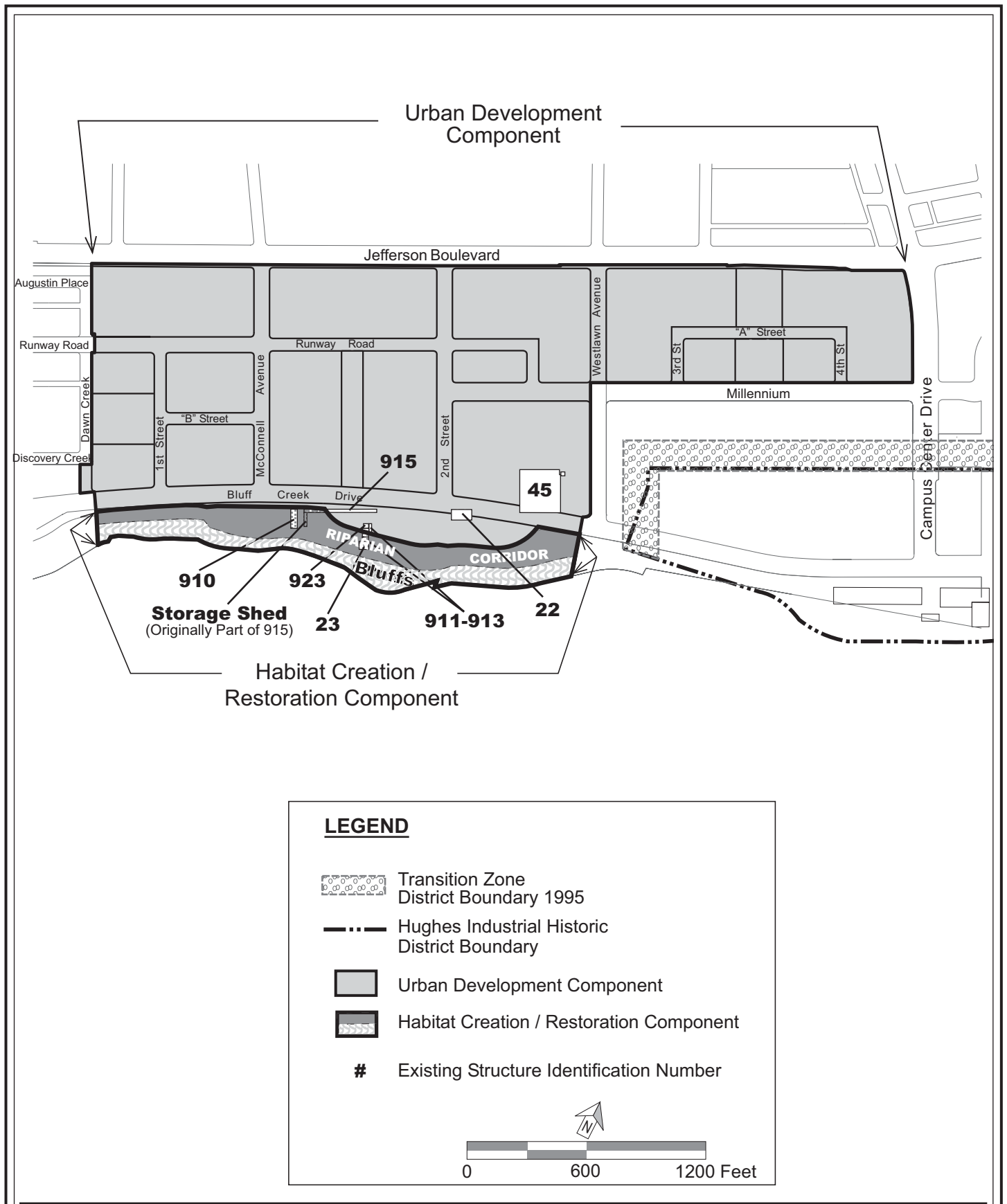


Figure 109  
**Existing Structures Located  
 within the Proposed Project Site**

Source: PCR Services Corporation and Historic Resources Group, July 2003



they are situated outside of the historic district's defined boundaries. The status of each of the buildings is summarized in Table 184 on page 1240 and described as follows.

### **Building 22: Power Plant**

The building is sited outside, and to the west of the Hughes Industrial Historic District. Built in 1942, Building 22 was among the first built on the property. The 1991 Survey Report stated that Building 22 was built in 1953, since this was when the building was moved to its current location. Its original construction date has now been corrected based on review of plans and drawings held by the Project Applicant. Entirely utilitarian in design, it is a one-story, rounded roofed rectangular shaped structure with a parapet. The framing system is comprised of a combination of wood and steel materials. The exterior and the interior walls are sheathed with stucco. Doors and fenestration are also utilitarian in nature. The building has a composition roof set on wood beams and bowstring trusses. The interior floor is concrete.

Building 22 was originally located within the Historic District boundaries at the southwest quadrant of the now-demolished Building 6. It was initially used to house emergency power diesel generators. The building was relocated in 1949, to an area outside of the established District where Building 45 is currently located. Upon relocation, it was used for airplane repair activities (paint and upholstery). In 1953, Building 22 was moved again to its current location for the construction of Building 45. At its current location, it was used as a Flight and Service Warehouse and government storage space. Since 1994, Building 22 has been used for movie set storage.

Though Building 22 was constructed in 1942, within the Hughes Industrial Historic District's period of significance (1941-1953), it was moved in 1949 to a location outside the established boundaries of the Historic District. It, therefore, has been assigned a National Register status code of 6Y2.<sup>589</sup> In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance.

### **Building 23: Old Test Building**

Building 23 is located outside, and to the west, of the Hughes Industrial Historic District. Built between 1941 and 1943, Building 23 is utilitarian in design. The one-story structure is

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<sup>589</sup> *California Office of Historic Preservation National Register Status Codes – 6Y2: Property determined ineligible for listing in the National Register through a consensus determination of a federal agency and the State Historic Preservation Officer.*

**Table 184****PROPERTIES SURVEYED WITHIN THE CURRENT STUDY AREA**

<b>Building</b>	<b>Description</b>	<b>Year Built</b>	<b>Rating</b>
22	Power Plant	1942	6Y2
23	Old Test Building	Between 1941-43	6Z1
45	Aircraft Hangar	1954	6Y2
910	F-3, Warehouse	Before 1953	6Z1
911	K-6, Paint Storage	1943	6Z1
912	K-2, Plumbing and Electrical Storage	1943	6Z1
913	K-1, Janitor Stores	1943	6Z1
915	F-2, Lumber Shelter, Building T	1953	6Z1
923	K-23, Ammunition Storage Shed	1951	6Z1
Storage Sheds	Portions of Salvage Yard (originally part of 915)	Between 1941-1953	6Z1

*6Y2 Property determined ineligible for federal, state, and local designation by the applicable regulatory agencies (e.g., State Office of Historic preservation, etc.)*

*6Z1 Property found ineligible for federal, state, and local designation based on an evaluation conducted by a qualified expert.*

*Source: Historic Resources Group/PCR Services Corporation, 2003.*

capped with a flat roof covered and sheathed with stucco. Each of the building's elevations is punctuated by a number of doors and window openings.

Originally located in the general area currently occupied by Building 45, which is outside the Historic District boundary, Building 23 was moved to its current location in the former Salvage Yard in 1954, when construction was to begin on Building 45. The building was once referred to as the "Old Test Building." After it was relocated, Building 23 was used as offices and as a warehouse for storage. It is currently vacant.

Though Building 23 was completed in 1943, within the Hughes Industrial Historic District's period of significance (1941-1953), it is located outside of the district's established boundaries. It, therefore, has been assigned a National Register status code of 6Z1.<sup>590</sup> In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance.

<sup>590</sup> *California Office of Historic Preservation National Register Status Codes – 6Z1: Property determined ineligible for federal, state, and local designation.*

**Building 45: Aircraft Hangar**

Sited outside of the National Register eligible Hughes Industrial Historic District boundary, Building 45 is considered a non-contributor because of its age and location. Constructed in 1954, the one-story hangar building is utilitarian in design, and is of steel frame construction. Rectangular in shape with an arched shaped bow roof, the building is wrapped with vertically ribbed corrugated iron metal siding. A large hangar-style sliding door defines the entire east elevation. Building 45 was used for aircraft maintenance and repair and helicopter maintenance training. Beside a large open bay area in its interior space, it also included a radio shop, machine shop, and warehouse. In 1980, the hangar was used as a training center for the assembling and disassembling of Apache helicopters. It was leased as a tire warehousing facility for part of the 1980s to 1990s. Building 45 has been used as a movie soundstage, mill, model shop, and storage area since the 1990s.

As stated above, Building 45 was constructed in 1954, outside of the Hughes Industrial Historic District's period of significance (1941-1953), and is located outside of the District's established boundaries. It is, therefore, considered a non-contributor to this historic district and has been assigned a National Register status code of 6Y2. In accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance.

**Building 910: Warehouse**

Building 910 was completed prior to 1953, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953). However, it too is located outside of the District's established boundaries. Because of its age and location it has been assigned a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.

**Building 911: Paint Storage**

Building 911 was construction in 1943, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953). It is located outside of the District's established boundaries. Because of its location it has been assigned a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.



**Building 912: Plumbing and Electrical Storage**

Building 912 was also erected in 1943, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953). However, it is located outside of the District's established boundaries. It, therefore, has been given a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.

**Building 913: Janitor Stores**

Building 913 was also constructed in 1943, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953). It too is located outside of the District's established boundaries. It, therefore, has been assigned a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not considered a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.

**Building 915 and Shed: Lumber Shelter**

Building 915 (and the shed on the west side of the former Salvage Yard, which was originally part of the Building 915 structure) was built in 1953, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953). However, it too is located outside of the District's established boundaries. Therefore, Building 915 has been assigned a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.

**Building 923: Ammunition Storage Shed**

Building 923 was constructed in 1951, which places its construction within the Hughes Industrial Historic District's period of significance (1941-1953), but outside of the District's established boundaries. It, therefore, has been assigned a National Register status code of 6Z1. As such, and in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, this building is not a historical resource for the purposes of CEQA compliance. This structure is not entirely used, except for storage.

## 3.0 IMPACT ANALYSIS

### 3.1 Methodology

This current analysis is based on the Historical Assessment Memorandum prepared by Historic Resources Group (Appendix O-7 of the EIR).<sup>591</sup> This historical assessment is based in part on a review of previous historic evaluations and environmental documentation regarding properties within, and in the vicinity of the Proposed Project site. The previous evaluations and environmental documentation reviewed were prepared in connection with an evaluation of historic resources for National Register Eligibility, pursuant to the requirements and protocols of Section 106 of the National Historic Preservation Act of 1966.<sup>592</sup> Those evaluations resulted in the identification of the Hughes Industrial Historic District in an area adjacent to the Proposed Project site. While some buildings within the current Proposed Project site were evaluated, it was determined that these building were not part of the Hughes Industrial Historic District. As part of the Section 106 process, the State Historic Preservation Officer and the Army Corps of Engineers concurred in the determination of the eligibility of the Historic District.<sup>593</sup>

This review of the previous documentation was supplemented by an additional site survey performed on February 28, 2003. This site visit was conducted to evaluate all of properties within the Proposed Project site. Additionally, relevant existing plans and drawings of the properties were reviewed. Information on the date and method of construction of each of the buildings within the Proposed Project site was collected or verified. Each of the buildings was evaluated for historical significance pursuant to Section 15064.5(a)(2)-(3) of the State CEQA Guidelines, as well as National Register and City of Los Angeles criteria.

### 3.2 Significance Thresholds

The Draft Los Angeles CEQA Thresholds Guide (p.M.3-3) states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

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<sup>591</sup> Historic Resources Group, (HRG), Memorandum re: *Historical Assessment of Playa Vista site, May 2, 2003.*

<sup>592</sup> *Previous documentation reviewed included the Playa Vista Entertainment, Media and Technology District Mitigated Negative Declaration and Addendum to the Environmental Impact Report for the Playa Vista First Phase (EIR No. 90-0200-SUB(C)(CUZ)(CUB); State Clearinghouse No. 90010510), an accompanying Technical Report, Hughes Industrial Historic District, City of Los Angeles, August 1995.*

<sup>593</sup> *Historic Resources Group, Hughes Industrial Historic District, Historic Resource Treatment Plan, Volume 1, p. 2, January 16, 1998.*

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Based on these factors, the Proposed Project would have a significant impact on Historic Resources, if:

- The Project would demolish, destruct, relocate or alter a historical resource such that the significance of the historical resource would be materially impaired; or
- The Project would reduce the integrity or significance of important resources on the site or in the vicinity.

### **3.3 Project Design Features**

The Proposed Project does not include any design features regarding potential effects on Historic Resources.

### **3.4 Project Impacts**

#### **3.4.1 Proposed Project Impacts**

The two significance thresholds for historic resources are based on consideration of both the thresholds described in the Draft Los Angeles CEQA Thresholds Guide (City Guide) and the provisions of CEQA (State CEQA Guidelines, 14 CCR Section 15064.5(b)(1)). Both guidelines define significance based on the identification of activities that would cause a “substantial adverse change” to the significance of a resource. The City Guide identifies four activities that could cause a significant impact (see Subsection 3.2, above). The first three activities are included within the first significance threshold, which is based on the significance language CEQA Guidelines, and is oriented towards potential impacts on structures within the Project site. The fourth activity in the City Guide pertains to the potential effect on the integrity of resources on the site or in the vicinity and has been incorporated into the second significance threshold.

The Proposed Project would demolish all of the existing buildings and structures within the Proposed Project site. Each of these structures is described and evaluated in Subsection 2.2.3 above. As indicated therein, none of the existing buildings and structures is considered a historical resource for the purposes of CEQA compliance. Therefore, the Proposed Project would not demolish, destruct, relocate or alter a historical resource such that the significance of a historical resource would be materially impaired.

The Proposed Project would alter the Project site through the development of new structures in an area that lies outside of, but in the vicinity of the Hughes Industrial Historic District. Development within the Historic District, and an adjacent transition zone, is subject to the rehabilitation and new construction guidelines established in the Historic Resource Treatment Plan.<sup>594</sup> The transition zone identifies a surrounding area in which new construction should be compatible with the historic character of the District and its contributing components so as to maintain the integrity of the District. As illustrated in Figure 109 on page 1238, the Proposed Project is located outside of both the District boundaries and the transition zone. Thus, Project development would have no effects regarding the implementation of the Historic Resource Treatment Plan, nor its criteria to maintain the integrity of the District. Therefore, the Proposed Project would not reduce the integrity of significance of important resources on the site or in the vicinity.

Since the Proposed Project would not demolish, destruct, relocate or alter any historical resources, and would not reduce the integrity of important resources in the site or its vicinity, the Proposed Project's impacts on historical resources would be less than significant.

### **3.4.2 Equivalency Program Impacts**

The preceding analysis addressed the Project's potential impact on on-site historic resources as well as historic resources in the vicinity of the Proposed Project site.

As described above, the Proposed Project would require the demolition of all of the structures within the Proposed Project site, but none of these structures are considered to be historic resources. Implementation of the Equivalency Program would require the demolition of the same structures. However, since, the structures are not historic resources, implementation of the Equivalency Program, as is the case with the Proposed Project, would not cause the demolition, destruction, relocation or alteration of a historical resource.

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<sup>594</sup> *Hughes Industrial Historic District, Historic Resource Treatment Plan, January 16, 1998.*

As further discussed above, buildings associated with the Proposed Project would be well beyond the boundaries of the Hughes Industrial Historic District and its transition zone, and would therefore not reduce the integrity or significance of important on-site resources or resources in the vicinity of the Project site. The exchange of office uses for retail and/or assisted living units would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project site. Therefore, all development under the Equivalency Program would also avoid impacts on the integrity or significance of important resources. Impacts on historic resources under the Equivalency Program, as is the case with the Proposed Project, would be less than significant.

### 3.4.3 Impacts of Off-Site Improvements

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Mitigation measures within Section IV.K.(1), Traffic and Circulation, require physical improvements in transportation facilities at numerous locations including roadway widening at seven locations, as described in Subsection 5.8 of that Section. In addition, as discussed in Section IV.N.(1), Water Consumption, the Proposed Project would require the construction of a water regulator station in the vicinity of Jefferson Boulevard and Mesmer Avenue.

No impacts are expected to occur to historic resources. No structures would be affected by the off-site improvements, and therefore, no historic structures would be affected. Excavation for the off-site improvements would be surficial and located in previously disturbed areas. All of the off-site improvements except the water regulator station occur within or adjacent to existing roadways. The water regulator station would include a small amount of piping equipment that would most likely be located just above ground. Excavation would be required to the depth of the existing main water line.

Further, a historic records search was performed to identify potential resources in the area of the proposed improvements.<sup>595</sup> The records search did not identify any resources that would be affected. One of the reports identified in the search pertains to the monitoring of previous construction activities involving the median between North Culver and South Culver Boulevard, which is also the location of two of the Proposed Project's roadway widenings. No resources were encountered during the previous construction of the median. The roadway widenings along the median would merely rework the previously disturbed areas. Therefore, none of the off-site

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<sup>595</sup> "Records Search Request for Seven Areas Located in Venice, Inglewood, and Beverly Hills Quadrangles, Los Angeles County, California," South Central Coastal Information Center, California Historical Resources Information System, UCLA Institute of Technology

improvements would result in significant impacts, unto themselves, nor would the off-site improvements, in combination with the Proposed Project result in a significant impact.

#### **4.0 MITIGATION MEASURES**

The Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impacts on historic resources. Therefore, no mitigation measures are recommended or required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

#### **5.0 UNAVOIDABLE ADVERSE EFFECTS**

The Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impacts on any historic resources.

#### **6.0 CUMULATIVE IMPACTS**

As described above, the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impact on historic resources and therefore would not contribute to cumulative impacts on historic resources. Except as noted below, the related projects are somewhat distantly located from the Proposed Project, inclusive of the Equivalency Program, and do not bear a close physical relationship to it, or the proposed off-site improvements, for the purposes of resulting in a cumulative historic resources impact. Further, based on available information, none of these related projects are known to contain historic resources. To the extent that historic resources within these related projects are identified at a later date, adverse impacts may occur. However, it is anticipated that should this occur, any activities that did occur involving these related projects would be subject to review under CEQA and would be mitigated to avoid or limit potential impacts.

The only known related project that contains historic resources is Related Project 40, the Playa Vista First Phase Project, located adjacent to the Proposed Project site. As described in Subsection 3.0 above, all development within the Hughes Industrial Historic District that lies within that project is subject to rehabilitation and new construction guidelines to preserve the integrity of the District. Therefore, the Playa Vista First Phase Project would not have a significant impact on its historic resources, and as described above, the Proposed Project, inclusive of the Equivalency Program, and the proposed off-site improvements are located sufficiently far from the District to avoid impacts on the integrity of the District. The Proposed

Project, inclusive of the Equivalency Program, and the proposed off-site improvements would not contribute incrementally to the demolition, destruction, relocation or alteration of any historical resources, nor the reduction in the integrity of important resources. Therefore, cumulative impacts on historical resources would be less than significant.

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## V. GROWTH-INDUCING IMPACTS

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### 1.0 INTRODUCTION

As required by CEQA Sections 15126(d) and 15126.2(d), an EIR must discuss the ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced or fostered in several general ways listed as follows:

- Direct growth associated with a project
- Creation of demand not satisfied within a project
- Creation of surplus infrastructure capacity not utilized by a project
- Creation of capacity by an agency not required by a project

A project could foster growth by removing obstacles to population growth. A type of project that is often cited as an example is the expansion of a major wastewater treatment plant, that would allow more development in a service area. In addition, some projects may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Each of these general categories is evaluated relative to the Proposed Project under separate subtitles below.

### 2.0 DIRECT GROWTH ASSOCIATED WITH THE PROJECT

The proposed land uses, related facilities and the respective populations that directly utilize them represent an increment of direct on-site growth. Such growth would add approximately 2,600 residential units, 175,000 square feet (sq.ft.) of office space, 150,000 sq.ft. of retail space, and 40,000 sq.ft. of civic and community facilities on the Proposed Project site. This increment of direct growth has been the subject of each of the analyses of Project impacts upon the various environmental categories presented in Section IV, Environmental Impact Analysis, of this EIR. The impacts of Project implementation would include effects on or from earth resources; air quality; water resources; biotic resources; noise; light and glare; land use; natural resources; safety/risk of upset; population, housing, and employment; traffic generation; public services; energy consumption; utilities; visual qualities (aesthetics and views); and



cultural resources. These effects are not considered growth-inducing because they would not provide an impetus for growth beyond the Proposed Project itself.

Per SCAG's 2001 Regional Transportation Plan forecasts, the Proposed Project's residential and employment generating uses are each within the respective growth forecasts for the SCAG region and subregion within which the Proposed Project is located. In addition, adopted zoning and District Plan entitlements provide for a larger overall increment of growth on the Project site than would the Proposed Project, though the ratios of employment and residential land uses are different. This means that the increment of direct growth attributable to the Proposed Project was anticipated by regional growth forecasts and local land use plans, and would be expected to occur whether or not the Proposed Project is implemented. Therefore, the direct growth attributable to this Project could not be classified as induced growth beyond expected levels on the subject property or in the subregion.

### **3.0 CREATION OF DEMAND NOT SATISFIED WITHIN THE PROJECT**

The Proposed Project's resident and employee populations may produce demand for goods, services or facilities not directly provided or satisfied by the Proposed Project, which could indirectly induce growth necessary to accommodate this demand off-site. Proposed on-site uses would be occupied daily and/or utilized by some 5,720 residents and 1,180 new employees. Collectively, these populations would be expected to generate demand for publicly provided services, including police and fire protection, and library, school, and recreation facilities, the off-site expansion of which, to accommodate project service demand, would be considered indirectly growth-inducing. However, off-site expansions of public services would be commensurate with demand, and the Proposed Project provides the fiscal means for the respective agencies (City of Los Angeles and the Los Angeles Unified School District) to address these issues. Therefore, the Project's demand for publicly provided services should not be growth-inducing.

Proposed Project populations also generate new demand for secondary services such as regional or specialty retail, restaurant or food delivery, and recreation and entertainment, as well as services and suppliers to support on-site commercial uses. Much or most of such Proposed Project's demand is intended to be accommodated on-site, since one of its major development principles is to create an internally oriented mixed-use community comprised of balanced components of basic residential, employment, retail, recreational and civic uses. However, it should not be assumed that all such demands would be accommodated on-site. Some demand should be expected to spill over off-site, which, in combination with any existing unmet demand, may induce new sources of supply if collective demand would warrant. Due to the large extent to which the Proposed Project has been prepared to provide for on-site demands, the Proposed Project's contribution to growth-inducement is expected to be limited.

In addition, parts of the on-site resident and employee populations should be expected to seek employment and housing, respectively, in communities surrounding the Proposed Project site and at greater distance, just as existing off-site residents and employees should be expected to seek employment or housing within the Project. As previously noted, the Project's predicted resident and employment populations are within subregion and surrounding community forecasts, and, therefore, are not expected to be directly growth-inducing. The Proposed Project is an in-fill development within an existing urban fabric, and further, has been designed to provide an internally mixed-use community. As a result, substantial amounts of unanticipated off-site regional growth would not be required to absorb an unbalanced fraction of unsatisfied Project demand for employment or housing.

Infrastructure improvements necessary to meet Project demands for water supply and distribution, wastewater treatment, solid waste management, and energy supply and distribution are addressed separately below.

**Water Distribution** – Implementation of the Proposed Project would create additional demand for approximately 0.503 mgd of potable water and 0.064 mgd of reclaimed water on an average day. On-site improvements to the existing water distribution system would be constructed to serve the proposed development and would be sized according to projected demands, including maximum day demands. Off-site improvements to water system facilities are being completed by the Los Angeles Department of Water and Power (LADWP) to provide adequate potable water for existing and planned area residents and businesses, including the Proposed Project (see Appendix N-1b for a letter from LADWP). With implementation of these planned improvements, development of the Proposed Project would not exceed water distribution infrastructure capacity. Proposed Project infrastructure improvements are required to meet Project flow and distribution needs. Therefore, these improvements are not considered growth-inducing.

**Wastewater Treatment** – A wastewater treatment capacity deficit is projected to occur by 2010 relative to peak month flows to the Hyperion Treatment System (HTS). This capacity deficit would occur even if the Proposed Project were not developed. The City of Los Angeles is currently updating the City's 20-year plan for wastewater management. Various measures and options have been identified for providing additional treatment capacity to the HTS. Proposed development would be included in estimates for future wastewater treatment needs, along with other regional growth. The Proposed Project would be subject to any City growth control measure in effect when applications for building permits are submitted, such as Ordinance No. 166,060.<sup>596</sup> While the City's decision to expand capacity within the HTS to accommodate

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<sup>596</sup> *City Ordinance No. 166,060 (Sewer Allocation) limits the annual increase in wastewater flows discharged into the HTS to 5 million gallons per day.*

managed future growth, may be growth-inducing, Proposed Project use of that future capacity would not induce additional growth.

**Solid Waste Management** – Implementation of the Proposed Project would generate a net amount of approximately 18.9 tons per day (tpd) of Class III solid waste. Based on the anticipated average diversion rate of 49.3 percent, only 50.7 percent, or approximately 9.6 tpd, would require disposal. This solid waste generation, which would amount to approximately 3,504 tons per year, would represent a 0.07 percent increase in the amount of City-generated solid waste that is disposed of at Class III landfills. Consequently, the solid waste generated by the Proposed Project would need to be disposed of at existing landfills.<sup>597</sup> This incremental contribution to Citywide solid waste disposal would exacerbate a projected shortage in Class III landfill capacity; however, such a shortage would occur regardless of whether or not the Proposed Project were implemented, and affected solid waste management agencies are currently taking steps to plan for, permit, and/or operate additional disposal facilities to meet projected demand. Given that the projected landfill capacity shortfall and the need for additional disposal capacity would occur with or without implementation of the Proposed Project, the Proposed Project would not induce growth in the region.

**Energy Supply and Distribution** – The Proposed Project proposes no facilities on-site or off-site to directly generate or co-generate energy. It would instead be reliant on conventional electric power and natural gas for most of its energy requirements, in addition to passive design techniques. Improvements to the existing electric and natural gas distribution systems would be required to create adequate distribution capacity to serve the Proposed Project. Such improvements would be sized to serve the demands of the Proposed Project and/or to provide improved service to existing users without inducing additional growth. Demand for natural gas from Proposed Project-related construction and operation would not require expansion or additional supply facilities, beyond distribution infrastructure. This demand would not induce growth that has not been accounted for in regional projections, including those for SCGC. The increase in electricity demand resulting from Proposed Project uses would not require expansion of supply facilities, as LADWP has ample system capacity to meet projected demand, including demand from the Project. Electricity distribution infrastructure would be upgraded to meet Project demands in the LADWP service area, though these improvements would only serve the adjacent Playa Vista First Phase Project and Proposed Project uses and would, therefore, not induce growth off-site.

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<sup>597</sup> For detailed information, see Section IV.N.(3) Solid Waste.

#### **4.0 CREATION OF SURPLUS INFRASTRUCTURE CAPACITY NOT UTILIZED BY THE PROJECT**

Should the Proposed Project create more infrastructure capacity than is needed to serve the Project, then the unused increment might be available to accommodate growth off-site. Such infrastructure capacity, beyond that discussed in the previous section, would be provided in the form of transportation facilities. In order to accommodate Project-generated traffic on the local street system, a substantial program of transportation system improvements would be necessary to increase capacity at various locations. In addition, the Project proposes a network of on-site roadways, providing access to and through the Project site. Such improvements could be growth-inducing if they contribute to a substantial reduction in traffic congestion and improved vehicular access in the greater locale. The Proposed Project's mitigation measures have been designed to mitigate Project impacts to a level beyond that required to meet the needs of the Project's additional traffic, thus enhancing traffic capacity at some locations. However, the increased capacity is not likely to result in notable, substantial reductions in traffic flows to a level that would induce new population into the area.

The Proposed Project's transportation improvements are also part of planned improvements to the regional road network required to meet the needs of existing, and otherwise anticipated new population. The transportation system improvements would be implemented under a subphasing plan that has been designed to ensure that the improvements are implemented commensurate with anticipated development to the extent feasible. There could be situations where anticipated impacts do not occur during the short-term, and unanticipated impacts do occur, prior to the implementation of a specific transportation system improvement. Therefore, there remains a potential for short-term excess capacity in advance of the planned development that would be resolved at later stages of implementation.

#### **5.0 CREATION OF CAPACITY BY AN AGENCY NOT REQUIRED BY THE PROJECT**

In considering the infrastructure needs of the Proposed Project, public agencies could increase infrastructural capacity under their jurisdictions beyond that required by the Project for other purposes in order to achieve economies of scale. The only instance in which such an occurrence is known to be possible regards a new regulator station south of Jefferson Boulevard and Mesmer Avenue and a future backup source of water (improvements to be determined at a later date by LADWP) in the event there is a water delivery disruption somewhere in the Lincoln/Jefferson region from LAX to Santa Monica. These new facilities, which would be sized larger than the requirements of the Proposed Project, are expected to provide more efficient service to existing users and would not be considered growth-inducing.

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## VI. SIGNIFICANT IRREVERSIBLE IMPACTS

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### 1.0 INTRODUCTION

The CEQA Guidelines require that an EIR address any significant irreversible environmental changes that would be involved in a project should it be implemented (CEQA Guidelines, Sections 15126(c) and 15126.2(c)). CEQA Guidelines Section 15126.2(c) indicates that “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.” The following discussion provides a summary of the impacts associated with the various environmental topics discussed in the previous sections of this EIR; and where significant impacts would occur, indicates whether such impacts are reversible or irreversible.

### 2.0 ANALYSIS

**Earth** – After mitigation, there would be no significant impacts associated with earth resources; therefore, no significant irreversible impacts would occur.

**Air Quality** – The Proposed Project’s significant contribution to regional emissions during construction would be short-term, and would cease with completion of the Project. The significant contribution to regional emissions from Project operations would be long-term, but might be reversible. Laws and regulations regarding air quality are being implemented through the activities of the SCAQMD, with resulting reductions in emission levels, while cumulative, regional growth continues.

**Water Resources** – After mitigation, there would be no significant impacts associated with hydrology or water quality. Therefore, no significant irreversible impacts would occur.

**Biotic Resources** – The Proposed Project, with implementation of the proposed mitigation measures, would not result in unavoidable significant impacts on biological resources. The Habitat Creation/Restoration Component of the Project would result in a net gain of 10.2 acres of native habitat, a beneficial impact. Development of the Urban Development

Component would result in a net loss of 60.9 acres of existing undeveloped area on the site. This undeveloped area has a long history of disturbance; in the past, the area has been developed with buildings, roads, parking areas, and a runway associated with the Hughes Industrial Complex. Currently this area is used on an ongoing basis to stockpile soil and crushed rock; provide a recycling site for construction materials; stage construction equipment, materials and personnel; and provide for temporary stormwater detention. This highly disturbed area still provides marginal foraging for certain wildlife species, such as raptors, and some marginal nesting habitat for common migrant birds. Loss of undeveloped area due to the Urban Development Component would be an unavoidable less-than-significant impact of the Project, but unlikely to affect long-term survival of species due to the restoration components of the Project and presence of more diverse foraging opportunities off site in the nearby Ballona Wetlands. It is concluded that while unavoidable adverse impacts on foraging raptors and nesting common migrant birds may occur due to loss of natural open space, these impacts will be less than significant.

**Noise** – The introduction of urban uses within the Proposed Project site would irreversibly increase the ambient noise environment of the immediately surrounding areas, however, the level of these impacts is less than significant.

**Light and Glare** – There are would be no significant impacts associated with shading or artificial light and glare; therefore, no significant irreversible impacts would occur.

**Land Use** – The Proposed Project is compatible with existing Plans. Further, it would not alter the character of surrounding uses nor divide an existing community. Therefore, the Proposed Project would not result in a significant impact on Land Use. As impacts on Land Use impacts are not significant, a long-term irreversible significant impact on land use would not occur.

**Mineral Resources** – There are would be no significant impacts associated with mineral resources; therefore, no significant irreversible impacts would occur.

**Safety/Risk of Upset** – After mitigation, there would be no significant impacts associated with safety/risk of upset; therefore, no significant irreversible impacts would occur.

**Population, Housing and Employment** – A local population would be established on the site. Other urban uses providing on-site employment opportunities would also be introduced, irreversibly committing a large portion of the site to urban uses including urban parks. These impacts are not significant, and therefore are not irreversibly significant. The beneficial impact on jobs/housing balance would be of long-term service to the regional distribution of housing and employment uses.

**Transportation and Circulation** – The urban uses to be introduced to the area would establish an essentially permanent demand on the existing transportation system, irreversibly altering the operations of the system. However, concomitant improvements to the street system, together with project design and other measures to reduce such demand, would reduce the impact. While the Project results in adverse impacts at some intersections, even after mitigation, the mitigation measures are anticipated to result in a better system-wide level of performance than that which occurs prior to the Project (i.e., the average roadway volume to capacity ratio is better with the Proposed Project and Mitigation Measure than the ratio for the 2010 baseline condition). If some mitigation measures are not implemented at the discretion of responsible agencies other than the City of Los Angeles, residual significant impacts could remain on a long-term basis. Impacts related to parking and bike plans are less than significant and, therefore, significant irreversible impacts would not occur.

**Public Services** – School, police, fire, library, and public recreation services would need to be expanded to serve the new resident and worker population. The increased demand on such services would be essentially irreversible. However, the anticipated new tax revenues to be produced by the Proposed Project could be used for providing services, at the discretion of the decision makers. Of the services, police services have been identified as having a potentially significant impact, and fire services have been identified as having a potentially significant impact, if an anticipated new fire station is not built. Such impact would be long-term unless additional funding is made available.

**Energy Consumption** – The Proposed Project would result in an incremental increase in the amount of non-renewable energy resources to be committed, which would consist of fossil fuels for creation of electricity and natural gas. While it is anticipated that such fuel consumption would not result in a substantial demand for energy resources relative to available supply, the Proposed Project's use of energy would be essentially irreversible, but not significant over the long-term. Though California has recently experienced electricity shortages in certain areas of the state, the Los Angeles Department of Water and Power, the service provider for the Proposed Project, did not experience such a shortage, and is anticipated to have ample supplies to meet future demands. No current shortage of natural gas exists, and future shortages are not expected. Also, energy conservation measures incorporated as Project Design Features would reduce energy consumption from levels that would otherwise occur.

**Utilities** – An essentially permanent, irreversible demand on the water supply system would be created on the site, although reduced by current conservation statutes, and Project Design Features. This impact, however, would not be significant, given that Project-related water use has been accounted for in regional projections.

An irreversible incremental new demand upon the City's wastewater treatment system would be created. However, the Proposed Project would not be allowed to contribute wastewater

flows to the local wastewater collection and treatment system unless adequate collection and treatment capacity exists to handle such flows, as required by the City's Sewer Allocation Ordinance; therefore, with the existing local ordinance and mitigation measures, no significant irreversible impacts would occur.

An irreversible new incremental demand upon solid waste disposal facilities would be created by the Proposed Project. However, no significant irreversible impacts would occur, beyond existing conditions, with or without the Proposed Project, as a comprehensive long-term solution for solid waste disposal must be secured.

**Visual Qualities** – Irreversible changes to the existing aesthetic character of the Proposed Project site would occur due to conversion of undeveloped land to urban uses. Of the various visual qualities analyzed, significant impacts were identified regarding the development of currently undeveloped land. This would result in loss of visual relief in the urban setting, and loss of bluff views from locations along Jefferson Boulevard. Such impacts would be irreversible for the life of the Proposed Project. However, the Proposed Project includes a Habitat Creation/Restoration component which would create and enhance the habitat value of the site, and in so doing add vegetation and a more natural appearance to the site, with completion of the riparian corridor and revegetation of the bluff face. The completion of Bluff Creek Drive adjacent to these improvements would provide a new public view corridor. Thus, there would be a long term, offsetting effect on the loss of views from Jefferson Boulevard. Further, new development would include landscaping in contrast to the site's current degraded appearance.

**Cultural Resources** – Implementation of the Project could result in potential direct and indirect adverse impacts on paleontological or archaeological resources associated with excavation, placement of fill and structures or from unauthorized collecting from disturbed rock units and spoils piles. However, overall, implementation of mitigation measures would reduce impacts to an acceptable level such that significant impacts would not occur. Therefore, no significant irreversible impact would occur. The Proposed Project would have no effects on historic resources and, therefore, no significant irreversible effects.



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## VII. ALTERNATIVES

### 1.0 INTRODUCTION

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The Draft Los Angeles CEQA Thresholds Guide and State CEQA Guidelines (Section 15126.6(a)) require an EIR to: (1) describe a range of reasonable alternatives to the proposed project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project; and (2) evaluate the comparative merits of the alternatives.<sup>598</sup> The State CEQA Guidelines (Section 15126.6(b)) direct that the analysis of alternatives be limited to alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

The selection and discussion of alternatives is intended to foster meaningful public participation and informed decision-making. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The State CEQA Guidelines (Section 15126.6(f)) also require the analysis of a “No Project” alternative and the identification of the “Environmentally Superior Alternative.” If the environmentally superior alternative is the No Project Alternative, then EIRs are required to identify an environmentally superior alternative among the other alternatives.

In addition, the State CEQA Guidelines (Section 15126.6(c)) require an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Accordingly, a large number of alternatives that might avoid or substantially lessen Project impacts was considered. Of the alternatives that were considered, seven were selected for analysis.

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<sup>598</sup> *The CEQA guidelines regarding the consideration and discussion of alternatives to a proposed project, as summarized here, are found in Section 15126.6 of the State CEQA Guidelines.*

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## 2.0 BASIC OBJECTIVES OF THE PROPOSED PROJECT

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Section II.C of the Project Description sets forth a list of the Project Objectives for the Proposed Project. As indicated therein, the overall purpose of the Proposed Project is to create a new residential community located around a “Village Center” that provides public gathering places, retail shops and offices. The Applicant’s overall purpose for the Project is further described in terms of 16 specific objectives that are supportive of its overall purpose. Section II.C of the Draft EIR also includes 14 objectives that reflect the City of Los Angeles’ objectives for the Project. They are based on applicable goals and policies in the City of Los Angeles’ planning documents.

Section II.C describes the numerous objectives that have been identified for the Project. The Basic Project Objectives are a subset of these numerous objectives and are listed below:

- To develop a new mixed-use community that would promote the internal relationship of mutually supportive uses such as employment, housing, recreation, and community-serving activities, so as to decrease dependency on the automobile, encourage pedestrian activity and alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, and foster a strong sense of community. Such efficiencies are intended to reduce vehicular trips, travel times and air pollution.
- To create an ecologically sound development that implements a comprehensive program of resource protection, enhancement, conservation and encourages recycling for both construction operations and long-term community activities.
- To develop an integrated new community with a unique identity that would generate jobs, housing, and recreational activities of a substantial scale and magnitude.
- To develop a project that meets the existing market demand for market housing, at a wide range of prices, on the Westside of Los Angeles.
- To develop a project that would address the City’s need for additional housing within the City and within the Westside area of Los Angeles in particular, pursuant to regional and local plans (e.g., the SCAG Regional Comprehensive Plan and Guide and the City of Los Angeles Housing Element of the General Plan); and in so doing, improve the housing supply and, thereby, improve the ratio of jobs to housing per plan goals.

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## 3.0 SELECTION OF ALTERNATIVES

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### 3.1 ALTERNATIVES SELECTED FOR THE ANALYSIS

Seven alternative project scenarios have been developed and analyzed to compare the relative impacts of a range of alternatives to the Proposed Project. The analysis of alternatives starts with the “No Project” Alternative. CEQA Guidelines Section 15126.6(e)(3) sets forth two options for discussing the No Project Alternative. The two options are to define the No Project Alternative in terms of no changes to existing on-site conditions (“no build”), or development of the site without approval of the Proposed Project (i.e., development under existing land use regulations). In order to fully address all applicable CEQA requirements, the first two alternatives analyzed in this Draft EIR are both No Project Alternatives that reflect these two options. Specifically, the first alternative analyzed is one in which no development would occur. The second alternative analyzed is one in which development would occur pursuant to existing land use regulations and without amendments to the Area D Specific Plan, or existing zoning. Based on comparative evaluations, estimations were made as to the environmental impacts of each alternative in contrast with those of the Proposed Project and whether each alternative could attain the Applicant’s Project objectives. The seven alternatives to the Proposed Project are summarized in Table 185 on page 1261 and are as follows:

#### **Alternative 1: No Project – No Development**

This alternative would produce no change to the existing physical condition and use of the Project site. Existing uses would continue.

#### **Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning**

This alternative would allow development that could occur without any amendments to the existing specific plan. Under this alternative, development would be limited to approximately 108,050 sq.ft. of office space (approximately 38 percent less than that included in the Proposed Project), but no residential, retail or community-serving uses.

Table 185

COMPARISON OF PROPOSED ALTERNATIVES TO THE PROPOSED PROJECT

Project Component	Proposed Project	Alternative 1: No Project – No Development	Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning	Alternative 3: Existing Specific Plan – Buildout <sup>b,c</sup>	Alternative 4: Reduced Intensity–25% Reduction <sup>f</sup>	Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office <sup>c</sup>	Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community-Serving Uses <sup>c</sup>	Alternative 7: Designated Alternative Site
Office	175,000 NSF	None [-175,000 NSF] <sup>a</sup> (-100%) <sup>a</sup>	108,050 NSF [-66,950 NSF] (-38%)	1,758,050 [+1,583,050] (+905%)	131,250 NSF [-43,750 NSF] (-25%)	None [-175,000 NSF] (-100%)	None [-175,000 NSF] (-100%)	175,000 NSF [Same] (Same)
Retail	150,000 NSF	None [-150,000 NSF] (-100%)	None [-150,000 NSF] (-100%)	615,000 NSF [+465,000 NSF] (+310%)	112,500 NSF [-37,500 NSF] (-25%)	None [-150,000 NSF] (-100%)	None [-150,000 NSF] (-100%)	150,000 NSF [Same] (Same)
Community-Serving <sup>d</sup>	40,000 GSF	None [-40,000 GSF] (-100%)	None [-40,000 GSF] (-100%)	20,000 GSF [-20,000 GSF] (-50%)	30,000 GSF [-10,000] (-25%)	30,000 GSF [-10,000] (-25%)	None [-40,000] (-100%)	40,000 GSF [Same] (Same)
Hotel	None	None [Same] (Same)	None [Same] (Same)	600 rooms [+600 rooms] (N/A)	None [Same] (Same)	None [Same] (Same)	None [Same] (Same)	None [Same] (Same)
Housing	2,600 units	None [-2,600 units] (-100%)	None [-2,600 units] (-100%)	None [-2,600 units] (-100%)	1,950 units [-650] (-25%)	1,950 units [-650] (-25%)	650 units [-1,950] (-75%)	2,600 units [Same] (Same)
Active Open Space (Parks)	12.4 acres <sup>e</sup>	None [12.4 acres] (-100%)	None [-12.4 acres] (-100%)	None [-12.4 acres] (-100%)	9.6 acres [-2.8 acres] <sup>f</sup> (-2.3%) <sup>f</sup>	9.6 acres [-2.8 acres] <sup>f</sup> (-23%) <sup>f</sup>	3.9 acres [-2.5 acres] <sup>g</sup> (-69%) <sup>g</sup>	12.4 acres [Same] (Same)

NSF = net square feet; GSF = gross square feet

<sup>a</sup> [vs. Proposed Project] ( percent change).

<sup>b</sup> Includes the remaining development permitted by the existing Area D Specific Plan , after First Phase development (VTM 49104 and TTM 52092); but would require a zone change and/or zone boundary adjustments.

<sup>c</sup> Alternatives 3, 4, 5 and 6 include the 11.7 acre riparian corridor and bluff face restoration as set forth for the Proposed Project.

<sup>d</sup> Uses such as post office, community centers, museums, health and child care facilities.

<sup>e</sup> The Proposed Project includes 11.4 acres of park space and 1.0 acre of bike lanes.

<sup>f</sup> Park space would be reduced 25 percent to 8.6 acres. 1.0 acre of bicycle lanes could still be provided.

<sup>g</sup> Park space would be reduced by 75 percent to 2.9 acres. 1.0 acre of bicycle lanes could still be provided.

Source: PCR Services Corporation, June 2003.

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**Alternative 3: Existing Specific Plan – Buildout**

This alternative would allow development of the Proposed Project site to the maximum land use entitlements permitted under the existing Area D Specific Plan. The development program for this alternative is based on the remaining uses which could occur beyond those that have been approved for development in the adjacent Playa Vista First Phase Project (VTTM 49104 and TTM 52092). However, to implement this alternative, changes and/or adjustments to the existing Specific Plan zoning boundaries would be required. In comparison to the Proposed Project, the existing plan allows for 905 percent more office space and 310 percent more retail uses; it includes a 600-room hotel component and no residential component.

**Alternative 4: Reduced Intensity – 25% Reduction**

This alternative would reduce the intensity of the Proposed Project development by reducing the amount of each of the developed uses, including office, retail, housing, community-serving and park space by 25 percent. It is assumed that development within the various use categories would occupy the same area of the Project site as the Proposed Project, only with reduced intensity.

**Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office**

This alternative would reduce both the overall intensity of the Proposed Project and the types of uses permitted. Housing, park space and community-serving uses would still occur, but would be reduced by 25 percent. Retail and office uses would be eliminated. It is assumed that the development reductions would occur at specified locations, rather than across the board, allowing for additional open space within the Project site.

**Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community-Serving Uses**

This alternative would limit development to low density, low-rise residential housing. The number of residential units would be reduced by 75 percent. It is assumed that development would occupy the same area as the Proposed Project, only varied by the type of housing provided.

**Alternative 7: Designated Alternative Site**

Various sites were surveyed and considered as an alternative location for Proposed Project development to address the relative impacts that would occur if the development were located somewhere other than at the Proposed Project site. Of the candidate sites,

one was selected for a comparative analysis of potential impacts. For purposes of this evaluation, only the uses in the Urban Development Component of the Proposed Project (office, retail, community-serving, and housing uses) were required uses in the selection of the alternative site; the availability of degraded bluff habitat or ability to complete the Freshwater Wetland System was not considered in screening potential alternative sites.

### 3.2 ALTERNATIVES CONSIDERED BUT REJECTED

The State CEQA Guidelines, Section 15126.6(c) states that an EIR shall consider a reasonable range of alternatives to the proposed project and that the EIR should briefly describe the rationale for selecting the alternatives to be discussed. As described in Section 15126.6(c), the reasons for rejecting alternatives from detailed consideration include the following: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.

Per Section 15126.6(c), the analysis of alternatives started with an identification of an extensive list of potential alternatives to the Proposed Project that had the potential to reduce or eliminate the Project's significant environmental impacts. The alternatives identified were then evaluated in terms of the three CEQA criteria identified above to determine those alternatives that would be analyzed further within the Draft EIR and those alternatives that would be rejected from further review. The alternatives that were identified but subsequently rejected from further analysis are identified in the following paragraphs along with a discussion of the basis for their rejection. Alternatives that were similar in terms of their basis for rejection have been grouped together to reduce the amount of redundancy in the following discussions.

- Regional Park. This alternative could include active recreation uses and could include a nine-hole golf course; or, alternately, the Habitat Restoration Alternative could include passive open space and the creation of wetlands ecosystems. These two potential alternatives would fail to meet nearly all of the Proposed Project's basic objectives. They would produce no jobs or housing. They would not provide an opportunity to implement a mixed-use community with the intended efficiencies that reduce traffic, noise and air pollutant levels. They would not contribute to the construction of additional housing within the City and Westside area, and would not improve the jobs/housing balance in the Westside area. Further, there is no indication that funding for such alternatives would be available. Implementation of these alternatives is therefore considered speculative.
- Public Entertainment Uses (e.g., theme park, casino/gaming or sports stadium) and Resort Hotel. These alternative land uses were considered as they capitalize on the importance of entertainment venues to the Southern California economy.

Alternatives involving these types of land uses would contribute to the creation of jobs, but none of them would provide housing. Therefore, the opportunity for a mixed-use development that would result in the planned efficiencies that reduce traffic, noise and air pollutant levels would be lost. The increase in jobs without housing would not only be inconsistent with the aforementioned basic Project objectives, but would exacerbate the existing imbalance in the ratio of jobs to housing and preclude an opportunity to provide housing within the City's west side. Furthermore, the development of Alternatives involving these types of land uses would bring considerable amounts of visitors to the area, with many potential impacts borne by the surrounding community. In addition, all of these Alternatives would be expected to generate notable impacts on their own, particularly increases in traffic, air quality and noise levels. In addition, these Alternatives would also be notably unlike the existing land uses in the area and would not provide the continuity of neighborhood uses as does the Proposed Project.

- Light Industrial/Institutional Uses (e.g., warehousing, storage, or hospital uses). These land uses were considered as potentially viable Alternatives to the Proposed Project. This is based on the existing light industrial and warehouse uses in the area north of the Project site, and such an alternative involving these land uses would carry those uses southward. There is no known interest in such a site for a major hospital facility, and the suggestion of such a use would be speculative. The construction of light industrial/institutional uses at the Project site would not meet the basic objectives of the Project by increasing the number of jobs in the area without commensurate increases in housing. These Alternatives would also exacerbate the existing imbalance in the ratio of jobs to housing and would not contribute to development of housing in the City's west side. Further, these Alternatives would not contribute to the mixed-use objectives that would result in the intended efficiencies that reduce traffic, noise and air pollutant levels.
- Transit Uses/Multi-Mode Transit Center. This Alternative was considered due to the Project site's large size and location in an area with many transit lines that serve a large area. However, there is no evidence that there would be sufficient demand for such a center at this location, and there is no indication that funding for such a facility would be available. Implementation of this alternative is therefore considered speculative. This alternative would not meet the basic objectives of the Project since it would produce neither new employment opportunities nor new housing opportunities. Further, the opportunity for a mixed-use development that would result in the intended efficiencies that reduce traffic, noise and air pollutant levels would be lost. This Alternative would also bring a considerable amount of traffic to the area, with many potential impacts borne by the surrounding communities.

- School (e.g., a large learning complex inclusive of middle and high schools). This Alternative was considered due to the Project site's large size and a generally perceived sense of the need for new schools. However, the existing middle and high schools in the Proposed Project area have capacity to meet anticipated needs; and interests in the development of new schools are currently being directed to other areas within the LAUSD's jurisdiction. Therefore, this alternative is considered infeasible. Further, this Alternative would not meet most of the Project's basic objectives. While the Alternative would provide employment opportunities, it would not provide housing; and it would not provide a mixed-use development that would result in the intended efficiencies that reduce traffic, noise and air pollutant levels.



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### 3.0 ANALYSIS FORMAT

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Each of the seven alternatives described in Subsection 1.0, above, is evaluated in sequence in the following Subsection 4.0. Each alternative is evaluated in less detail than in Section IV, Environmental Impact Analyses, of the EIR but in sufficient detail to determine whether overall environmental impacts after mitigation would be better, similar or worse than the corresponding net impacts of the Proposed Project, and whether the basic objectives of the Proposed Project are substantially attained. With one exception, the comparisons of impacts are based on the potential impacts that would occur for the Proposed Project and the Alternatives after mitigation. The conclusions regarding the comparisons of the Proposed Project and the Alternatives for Traffic and Circulation are based on impacts prior to mitigation.

The analysis of each alternative includes a comparative evaluation of the impacts of the Alternative versus those of the Proposed Project for each of the environmental topics addressed in Section IV. Each analysis includes a discussion of impacts, a comparative summary table, and a summary statement of conclusions.

Following the analysis of the individual alternatives, Subsection 5.0, provides an overview and comparative presentation for all of the Alternatives analyzed. This section includes a tabular summary of the relative advantages and disadvantages of each of the Alternatives. Subsection 5.0 also identifies the Project's environmentally superior alternative per the requirements of Section 15126.6(e)(2) of the CEQA Guidelines.

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**4.0 EVALUATION OF THE ALTERNATIVES**  
**4.1 ALTERNATIVE 1: NO PROJECT (NO DEVELOPMENT)**

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**4.1.1 INTRODUCTION**

This section presents an environmental analysis of an alternative project in which the Playa Vista site would not be developed and would retain its existing land use and zoning designations.

**4.1.2 ANALYSIS**

**4.1.2.A Earth**

Under Alternative 1, no development would occur within the Proposed Project site. As such, the site would retain its existing land use character. Hence, this alternative would not include stabilization of the bluffs, as under the Proposed Project, and the net slope stability impact of this alternative would therefore be less beneficial. However, this no-development scenario would avoid grading impacts and exposure of new residents/employees to seismic activity, notwithstanding that such impacts are mitigable. Overall, this alternative would result in reduced impacts related to earth resources than those of the Proposed Project.

**4.1.2.B Air Quality**

This alternative would include no new development, and therefore would not generate air pollutants.

**4.1.2.C Water Resources**

**4.1.2.C.(1) Hydrology**

**Surface Water.** Under this alternative, no development would occur within the Proposed Project site, including Riparian Corridor improvements. As such, the impervious surfaces that would occur under the Proposed Project would not be developed, thereby avoiding the reduction in surface water infiltration and the increase in runoff volume and velocity that would occur under the Proposed Project. Under Alternative 1, the on-site infiltration would be greater than the infiltration under the Proposed Project and the volume of water flowing off of

the site to receiving waterbodies (i.e., the Freshwater Wetlands System) during a storm event would be less (irrespective of the absence of Riparian Corridor improvements). Additionally, Alternative 1 would not affect the movement or flow of surface water, as the overall drainage characteristics of the site would be generally similar to the Proposed Project (i.e., the direction and rate of flow of runoff would be similar). Therefore, surface water hydrology impacts under Alternative 1 would be less than significant, as is also the case for the Proposed Project.

**Groundwater.** Under this alternative, no development would occur within the Proposed Project site. The site would retain its existing land use character and no permanent dewatering would occur on-site. However, as described above, Alternative 1 would have a greater infiltration and less runoff than the Proposed Project, thereby producing less runoff for the Freshwater Wetlands System compared to the Proposed Project. The greater infiltration under this alternative would also provide more recharge to the groundwater than under the Proposed Project. However, the riparian corridor would not be completed. Overall, as is the case with the Proposed Project, no significant adverse impacts would occur.

#### **4.1.2.C.(2) Water Quality**

**Surface Water.** Under this alternative, no development would occur within the Proposed Project site and the site would retain its existing land use character. Without the developed land uses of the Proposed Project, the runoff from the site would have fewer pollutants than it would if the Proposed Project were built. However, the Riparian Corridor would not be completed. Overall, no significant adverse impacts would occur.

**Groundwater.** Under this alternative, no development would occur within the Proposed Project site. Similar to the Proposed Project, remediation of existing groundwater contamination from former uses would occur under Alternative 1, as required by the RWQCB's Cleanup and Abatement Order No. 98-125. As with the Proposed Project, groundwater under this alternative would not be used for drinking water.

#### **4.1.2.D Biotic Resources**

This alternative proposes no change to the existing physical condition of the Proposed Project site. Within the Proposed site, vegetation occurs as fragmented patches between roads, buildings, and parking lots. Successional trends indicate that if left undisturbed, the site would not recover its historical biological state because of the severely altered hydrology that makes the site's vegetation dependent on variable rainfall instead of steady stream flow. Centinela Ditch, if left undisturbed, would continue its function as a storm drain without providing significant habitat values for wildlife. Within the Proposed Project site, animal species diversity and

abundance are low when compared with unfragmented native habitat of high quality. No special status species are known to depend on the Proposed Project site.

This alternative would allow the continued growth of non-native vegetation such as pampas grass and iceplant. This alternative would not benefit from the Proposed Project's Riparian Corridor component that would result in an enhanced habitat.

#### **4.1.2.E Noise**

No development would occur within the Project site under this alternative. Consequently, it would not generate any new or increased sources of noise on the Project site or within the surrounding vicinity.

#### **4.1.2.F Light and Glare**

##### **4.1.2.F.(1) Natural Light – Shading**

This alternative would preclude the addition of new shading. There would be no impact.

##### **4.1.2.F.(2) Artificial Light and Glare**

This alternative would preclude the addition of lighting to the Project site. There would be no impact.

#### **4.1.2.G Land Use**

This alternative would avoid the changes in land use distribution which occur under the Proposed Project and avoid environmental affects on nearby areas, as described under the various environmental topics analyzed in other sections of this EIR.

At the same time, this alternative would not fulfill the planned use of the Project site as an activity center, and place for new population, and business activity (per regional plans – SCAG's Regional Growth Management Plan and the City's General Plan and per the Area D Specific Plan).

Under this alternative, the Proposed Project site would remain available for another use, which could be more or less intensive than the Proposed Project. To the extent that potential Project population locates elsewhere, land use effects would be transferred to other locations, without the benefit of the mixed-use efficiencies associated with the Proposed Project.

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#### **4.1.2.H Mineral Resources**

Under this alternative, no development would occur within the Proposed Project site. As such, the site would retain its existing land use character and no significant adverse impacts to mineral resources would occur.

#### **4.1.2.I Safety/Risk of Upset**

Under this alternative, no development would occur within the Proposed Project site. As such, the site would retain its existing land use character and no safety or risk of upset impacts would occur.

#### **4.1.2.J Population, Housing and Employment**

Under the No Project Alternative, no residential or commercial development would take place and no population, housing or employment increases would occur. That portion of sub-regional population growth that would be served by the Proposed Project would likely locate at other dispersed sites within the sub-region.

#### **4.1.2.K Transportation**

##### **4.1.2.K.(1) Traffic and Circulation**

The No Project Alternative assumes there would be no change to the existing condition and use of the Project site. The volumes and traffic conditions for this alternative are equivalent to the 2010 base condition scenario, which includes future 2010 traffic forecasts including traffic generated by the identified related projects. This alternative would result in no traffic impacts.

##### **4.1.2.K.(2) Parking**

This alternative would generate no new demand for parking.

##### **4.1.2.K.(3) Bicycle Plan**

Under this alternative, additional bicycle ridership would not be generated from activities at the Project site. At the same time, no improvement to the existing bikeway network would occur and no new bikeways or connections would be developed.

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#### **4.1.2.L Public Services**

##### **4.1.2.L.(1) Fire Protection**

With no change to the existing physical condition or use of the Project site, there would be no change in the demand for fire protection and emergency medical services. No additional impacts on the Los Angeles City Fire Department would occur.

##### **4.1.2.L.(2) Police Protection**

With no change to the existing physical condition or use of the Project site, there would be no change in the demand for police protection services and no impacts on the Los Angeles Police Department.

##### **4.1.2.L.(3) Schools**

With no change to the existing physical condition or use of the Project site, there would be no change in student generation or the demand for school services.

##### **4.1.2.L.(4) Parks and Recreation**

Under this alternative, no development of residential uses would occur and no additional population would be introduced to the site. No demand for open space, parks, or recreational facilities would be created. This alternative would result in less per capita open space and recreational facilities in the area than would occur under the Proposed Project.

##### **4.1.2.L.(5) Libraries**

Under this alternative, no development of residential uses would occur and no additional population would be introduced to the City library service areas. No demand for, or impact on, library facilities and services would occur.

#### **4.1.2.M Energy Consumption**

Under this alternative, no development would occur within the Proposed Project site. As such, there is no energy consumption associated with this alternative, other than the minimal consumption associated with Buildings 22 and 45, various minor sheds, storage buildings, and construction trailers associated with the adjacent Playa Vista First Phase Project, and no adverse impacts would occur.

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#### **4.1.2.N Utilities**

##### **4.1.2.N.(1) Water Consumption**

Under this alternative, no development would occur within the Proposed Project site. As such, there is no water consumption associated with this alternative, other than the minimal consumption associated with Buildings 22 and 45, various minor sheds, storage buildings, and construction trailers associated with the adjacent Playa Vista First Phase Project, and no adverse impacts would occur.

##### **4.1.2.N.(2) Wastewater**

Under this alternative, no development would occur within the Proposed Project site. As such, there is no wastewater generation associated with this alternative, other than the minimal generation associated with Buildings 22 and 45, various minor sheds, storage buildings, and construction trailers associated with the adjacent Playa Vista First Phase Project, and no adverse impacts would occur.

##### **4.1.2.N.(3) Solid Waste**

Under this alternative, no development would occur within the Proposed Project site. As such, there is no solid waste generation associated with this alternative, other than the minimal generation associated with Buildings 22 and 45, various minor sheds, storage buildings, and construction trailers associated with the adjacent Playa Vista First Phase Project, and no adverse impacts would occur.

#### **4.1.2.O Visual Qualities (Aesthetics and Views)**

This alternative would retain the existing, undeveloped state, thus allowing some visual break in urban development and maintenance of bluff views for travelers along Jefferson Boulevard. The currently degraded quality of the open space would not be enhanced.

#### **4.1.2.P Cultural Resources**

##### **4.1.2.P.(1) Paleontological Resources**

Under the No Project Alternative, no grading, excavation, fill, or other ground disturbing activities would take place, and no impacts on paleontological resources would be expected. At

the same time, the potential discovery of artifacts, which might occur under mitigation associated with the Proposed Project, would not occur.

#### **4.1.2.P.(2) Archaeological Resources**

No ground disturbing construction activities would take place under the No Project Alternative. Under this alternative, archaeological sites would not be disturbed, destroyed, or removed. No impacts on archaeological and historical resources would be expected. At the same time, the potential discovery of artifacts, which might occur under mitigation associated with the Proposed Project, would not occur.

#### **4.1.2.P.(3) Historical Resources**

Under this alternative, the existing structures located on the southern portion of the site would not be demolished. These structures would likely remain until another use is applied to the site. However, these structures are not considered historical resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

### **4.1.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative impacts between the No Project Alternative and the Proposed Project is presented in Table 186 on pages 1275 through 1277. The No Project Alternative would eliminate significant impacts that would occur with the Proposed Project, including: regional air quality, construction noise, traffic, visual qualities, police services, and solid waste disposal. The No Project Alternative would also result in the avoidance of all adverse, non-significant impacts anticipated to occur with the development of the Proposed Project, including: operational noise, earth (seismic hazards), local air pollution, and other services.

Conversely, the No Project Alternative eliminates net beneficial effects that would occur with the Proposed Project, including: bluff restoration and biotic resources, jobs/housing balance, housing, job creation, bicycle circulation, and parks and recreation facilities.

Since the Proposed Project is not a government project (which, by nature, responds to a public health or safety need), the No Project Alternative would produce no adverse environmental impacts, except by omission of improvements associated with the Proposed Project. In other words, the Proposed Project's design would result in implementation and completion of privately funded remediation of existing public safety concerns in the area (i.e.,



localized flooding, bluff stability, and surface and ground water pollution), which would not be implemented under the No Project Alternative.

#### **4.1.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

The No Project – No Development Alternative would not attain any of the Applicant’s basic Project objectives for the Proposed Project (as listed on page 1259). It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing and recreational activities of a substantial scale and magnitude. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and City’s need for housing Citywide and in the Westside, in particular. This alternative would not implement the proposed programs for resource protection, enhancement, conservation, and reuse.

Table 186

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 1 (NO PROJECT)  
TO THE PROPOSED PROJECT\***

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	No Impact	Beneficial	Better/Worse	No grading would occur/no stabilization of bluffs.
Dewatering/Subsidence	No Impact	No Impact	Similar	No potential dewatering/subsidence.
Seismic Hazards	No Impact	Non-Significant	Better	No new residents/employees exposed to seismic activity.
Slope Stability	No Impact	Non-Significant	Worse/Similar	Loss of beneficial stabilization of bluffs/no exposure to residents.
<b>Air Quality</b>				
Construction/Regional Emissions	No Impact	Significant	Better	No contribution to emissions level.
Construction/Local Emissions	No Impact	Non-Significant	Better	No contribution to emissions level.
Operations/Regional Emissions	No Impact	Significant	Better	No contribution to emissions level.
Operations/Local Emissions	No Impact	Non-Significant	Better	No contribution to emissions level.
<b>Water Resources/Hydrology</b>				
Surface Water	No Impact	Non-Significant	Similar	Reduced runoff. No improvements to storm drain system. No completion of Riparian Corridor.
Groundwater	No Impact	Non-Significant	Similar	No landscape irrigation or permanent dewatering.
<b>Water Resources/Water Quality</b>				
Surface Water	No Impact	Non-Significant	Similar	No additional urban runoff, but no completion of Riparian Corridor.
Groundwater	No Impact	Non-Significant	Similar	No potential to affect groundwater.
<b>Biotic Resources</b>				
Plant Life	No Impact	Beneficial	Worse	Habitat degradation would likely continue through succession. No habitat enhancement without the completion of Riparian Corridor.
Animal Life	No Impact	Beneficial	Worse	Habitat degradation would likely continue through succession.
<b>Noise</b>				
Construction	No Impact	Significant	Better	No construction.
Stationary	No Impact	Non-Significant	Better	No new stationary sources.

**Table 186 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 1 (NO PROJECT)**  
**TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
Mobile	No Impact	Non-Significant	Better	No new mobile sources.
<b>Light and Glare</b>				
Natural Light – Shading	No Impact	Non-Significant	Better	No construction to generate shadows.
Artificial Light and Glare	No Impact	Non-Significant	Better	No alterations to nighttime appearance of site.
<b>Land Use</b>				
Regulatory	No Impact	Non Significant	Better/Worse	No additional land use actions required. Plans for regional centers would remain in effect. Would not achieve planning goals for in-fill development, but would maintain undeveloped area
Land Use Pattern	No Impact	Non Significant	Better	Would avoid changes to the setting.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Better	Site would retain its existing land use character.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	No Impact	Non-Significant	Better	No new construction or exposure risk.
<b>Population, Housing and Employment</b>				
Population	No Impact	Non-Significant	Worse	Projected subregional population not served.
Housing	No Impact	Beneficial	Worse	Loss of 2,600 units and housing choices.
Employment	No Impact	Beneficial	Worse	Loss of 1,180 employment opportunities.
Jobs/Housing Bal.	No Impact	Beneficial	Worse	Current and projected unfavorable jobs/housing balance not served (current ratio for local study area is 2.66 vs. 0.45 for the Proposed Project. The local area jobs/housing balance ratio would reduce from 2.66 to 2.43 with the Proposed Project).
<b>Transportation</b>				
Traffic and Circulation	No Impact	Significant	Better	No new traffic.
Parking	No Impact	No Impact	Similar	No new demand.
Bicycle Plan	No Impact	Beneficial	Worse	No new bicycle paths.

**Table 186 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 1 (NO PROJECT)**  
**TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Public Services</b>				
Fire Protection	No Impact	Non-Significant	Better	Better, unless additional revenues are ear-marked to costs of provision.
Police Protection	No Impact	Significant	Better	Better, unless additional revenues are ear-marked to costs of provision.
Schools	No Impact	Non-Significant	Better	Better, unless additional revenues are ear-marked to costs of provision.
Parks and Recreation	No Impact	Non-Significant	Worse	No new parks or improved open space.
Libraries	No Impact	Non-Significant	Better	Fewer demands for library resources.
<b>Energy Consumption</b>				
Energy Consumption	No Impact	Non-Significant	Better	No energy consumption.
<b>Utilities</b>				
Water Consumption	No Impact	Non-Significant	Better	No water consumption.
Wastewater	No Impact	Non-Significant	Better	No wastewater generation.
Solid Waste	No Impact	Significant	Better	No solid waste generation.
<b>Visual Qualities (Aesthetics and Views)</b>				
Aesthetics	No Impact	Non-Significant	Better/Worse	No new development in existing undeveloped area. Benefits of new landscaping would not occur.
Views	No Impact	Significant	Better	Existing views maintained.
<b>Cultural Resources</b>				
Paleontological Resources	No Impact	Non-Significant	Better/Worse	No potential disruption of resources/no potential discovery of artifacts, per mitigation program
Archaeological Resources	No Impact	Non-Significant	Better/Worse	No potential disruption of resources/no potential discovery of artifacts, per mitigation program.
Historical Resources	No Impact	No Impact	Similar	In either case, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## **4.2 ALTERNATIVE 2: NO PROJECT –DEVELOPMENT PERMITTED BY THE EXISTING SPECIFIC PLAN AND ZONING**

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### **4.2.1 INTRODUCTION**

This section presents an environmental analysis of an alternative project in which the Proposed Project would not be approved and future development of the site would occur in accordance with existing land use regulations. Existing on-site zoning is either R4(PV) or M(PV), with the M(PV) and R4(PV) zoning occurring on the northern and southern portions of the Project site, respectively. As the adjacent Playa Vista First Phase Project utilized all of the residential development permitted within the Area D Specific Plan, no further residential development could be developed as part of this alternative. Therefore, the southern portion of the Project site that is zoned R4(PV) would remain undeveloped under this alternative. However, development under this Alternative could occur within the M(PV) zone along the northern portion of the Project site. Under the Area D Specific Plan, 2,950,000 sq.ft. of M(PV) uses may be developed. The adjacent Playa Vista First Phase Project includes 2,841,950 sq.ft. of development within off-site areas that are zoned M(PV). This leaves 108,050 sq.ft. remaining for development within the Project site. For the purposes of this analysis, it has been assumed that the development would be office space. This particular land use would be compatible with development in the adjacent Playa Vista First Phase Project. It is assumed that the development occurring under this alternative would be located in a two to four story building located on 1 to 2 acres at the northern edge of the Project site. No other development would occur. This alternative would not include the implementation of the riparian corridor or the bluff face restoration.

Table 187 on page 1279 compares this alternative with the Proposed Project for each of the major land uses and related Project components.

For each environmental issue area, a comparative determination is made as to whether the overall adverse environmental impacts of this alternative would be better, similar, or worse than the corresponding Proposed Project impacts. Impact comparisons for all topics other than Traffic and Circulation are based on impacts prior to mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts after mitigation. A summary of comparative adverse impacts is presented at the end of the analysis for this Alternative in Table 194 on pages 1296 through 1299.

Table 187

**COMPARISON OF ALTERNATIVE 2 COMPONENTS:  
REDUCED PROJECT TO THE PROPOSED PROJECT**

<b>Project Component</b>	<b>Unit</b>	<b>Alternative Project</b>	<b>Proposed Project</b>	<b>Numerical Difference</b>	<b>Percent Change</b>
Office	NSF	108,050	175,000	-66,950	-38%
Retail	NSF	0	150,000	-150,000	-100%
Community-Serving	GSF	0	40,000	-40,000	-100%
Total Housing	Units	0	2,600	-2,600	-100%
Active Open Space (Parks)	Acres	0	12.4	-12.4	-100%

*NSF – net square feet*

*GSF – gross square feet*

*Source: PCR Services Corporation, 2002.*

## 4.2.2 ANALYSIS

### 4.2.2.A Earth

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

Under Alternative 2, no development would occur within the Proposed Project site, with the exception of office uses (reduced 38 percent from office uses under the Proposed Project). As such, the site would generally retain its existing land use character, but a small portion of the site would be developed with office uses within the area zoned M(PV). The limited development scenario under this alternative would substantially reduce grading impacts relative to the Proposed Project, by minimizing excavation and fill requirements and the associated potential for erosion and sedimentation. Very limited, if any, dewatering would be required under this alternative, and therefore the potential for subsidence would be minimal. Alternative 2 would greatly reduce the exposure of new residents/employees to seismic activity, (including risks associated with groundshaking/fault rupture, tsunami and seiche, liquefaction, and lurching), notwithstanding that such impacts are mitigable. As pertains to slope stability, since the area zoned M(PV) is located on the northern portion of the Project site, the office uses proposed under Alternative 2 would not be located in proximity to the bluffs along the southern edge of the site. As a result, this alternative would not include stabilization of the bluffs (as would occur under the Proposed Project), and the net slope stability impact of this alternative would,

therefore, be less beneficial. Overall, this alternative would result in substantially reduced impacts related to earth resources compared to those of the Proposed Project.

#### 4.2.2.B Air Quality

The amount of site preparation under this alternative would require substantially less excavation and grading activities than the Proposed Project and construction activities would be proportionally reduced based on the reduction in square footage. Pollutant emissions and fugitive dust from site preparation and construction activities would be substantially less on a daily basis as well as over the entire construction period. The reductions in construction emissions would be sufficient to avoid the significant impact on CO associated with the Proposed Project. However, the reductions in regional construction emissions for this alternative would not be sufficient to avoid the significant impacts on NO<sub>x</sub> and ROC associated with the Proposed Project. Local emissions dispersions from fugitive dust emissions from grading would be similar to those of the Proposed Project, as the duration of excavation and grading would be less, but not the daily activity. As such, localized PM<sub>10</sub> impacts under this alternative, as is the case with the Proposed Project, would not be significant.<sup>599</sup>

The number of daily trips generated by this alternative would be 94 percent less than the Proposed Project, resulting in proportionate decreases in mobile source emissions. Emissions from stationary sources would be reduced by 95 percent, however emissions from these sources comprise a very small portion of the alternative's overall emissions. The reductions in stationary and mobile source emissions would be sufficient to avoid the significant impacts on CO, PM<sub>10</sub>, NO<sub>x</sub> and ROC that are associated with the Proposed Project. The total contributions to regional emissions under this alternative would be less than significant, as opposed to the significant impacts that result from the Proposed Project. The reduction in traffic associated with this alternative (i.e., a reduction of 22,652 daily trip ends), would contribute to a proportionate decrease in localized emissions of carbon monoxide. The maximum predicted carbon monoxide concentration for the Proposed Project combined with 2010 base traffic was 7.1 ppm or 21 percent below the 9.0 ppm significance threshold for localized carbon monoxide. The Proposed Project resulted in approximately 6 percent of the pollutant concentration or 0.4 ppm. Therefore, a 94 percent decrease in daily trips generated by this alternative would decrease the increment from 0.4 ppm to less than 0.1 ppm and would be approximately 25 percent below the 9.0 ppm significance threshold for localized carbon monoxide.

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<sup>599</sup> All calculations used in this analysis are presented in Appendix E, Air Quality Technical Appendices, of this EIR.

### 4.2.2.C Water Resources

#### 4.2.2.C.(1) Hydrology

**Surface Water.** Under this alternative, no development, aside from the reduced office uses within the M(PV) zone, would occur within the Proposed Project site, including the Riparian Corridor improvements. As such, the majority of the impervious surfaces that would occur under the Proposed Project would not be developed, thereby substantially increasing surface water infiltration and reducing runoff volume and velocity that would occur under the Proposed Project. Under Alternative 2, the on-site infiltration would be greater than the infiltration under the Proposed Project and the volume of water flowing off of the site to receiving waterbodies (i.e., the Freshwater Wetlands System) during a storm event would be less (irrespective of the absence of Riparian Corridor improvements). Additionally, Alternative 2 would minimally affect the movement or flow of surface water (i.e., only at and immediately surrounding office uses), as the overall drainage characteristics of the site would be generally similar to the Proposed Project (i.e., the direction and rate of flow of runoff would be similar). Therefore, surface water hydrology impacts under Alternative 2 would be less than significant, as is also the case for the Proposed Project.

**Groundwater.** Under this alternative, no development would occur within the Proposed Project site, with the exception of reduced office uses within the M(PV) zone. The majority of the site would retain its existing land use character and very limited, if any, permanent dewatering (e.g., for subsurface methane safety systems for office buildings) would occur on-site. However, as described above, Alternative 2 would have greater infiltration and less runoff than the Proposed Project, thereby producing less runoff for the Freshwater Wetlands System compared to the Proposed Project. The greater infiltration under this alternative would also provide greater recharge to local groundwater basins than under the Proposed Project. Overall, no significant adverse impacts would occur.

#### 4.2.2.C.(2) Water Quality

**Surface Water.** Under this alternative, only office uses would occur within the Proposed Project site, and the site would generally retain its existing character. Given the substantially reduced development under Alternative 2 relative to the developed land uses of the Proposed Project, the runoff from the site would have considerably fewer pollutants (volume and concentrations) than it would if the Proposed Project were built. However, no Riparian Corridor improvements would occur. Overall, no significant adverse impacts would occur.

**Groundwater.** Under this alternative, no development would occur within the Proposed Project site, aside from limited office uses. Similar to the Proposed Project, remediation of



existing groundwater contamination from former uses would still occur under Alternative 2, as required by the RWQCB's Cleanup and Abatement Order (CAO) 98-125. As with the Proposed Project, groundwater under this alternative would not be used for drinking water. As such, the site for the most part would retain its existing land use character and no significant adverse impacts would occur.

#### **4.2.2.D Biotic Resources**

This alternative proposes very few changes to the existing physical condition of the Proposed Project site. An incidental amount of exotic and non-native plants would be brought to the site in the form of building landscaping. Otherwise, on-site biotic resources would not be affected by this alternative. The riparian corridor and bluff face restoration would also not occur.

Within the Project site, vegetation occurs as fragmented patches between roads, buildings, and parking lots. This alternative would allow the continued growth of non-native vegetation such as pampas grass and iceplant. Successional trends indicate that if left undisturbed, the site would not recover to its historical biological state because of the severely altered hydrology that makes the site's vegetation dependent on variable rainfall instead of steady stream flow. Centinela Ditch would remain in its present condition and, if left undisturbed, would continue its function as a storm drain without providing significant habitat values for wildlife. Within the Proposed Project site, animal species diversity and abundance are low when compared with unfragmented native habitat of high quality. No special status species are known to depend on the Proposed Project site. This alternative would have a less-than-significant impact on biotic resources, whereas the Proposed Project would have a beneficial impact. This alternative would not benefit from the Proposed Project's Riparian Corridor component that would result in enhanced habitat.

#### **4.2.2.E Noise**

The amount of development that would occur under this alternative would be substantially reduced from that of the Proposed Project, and limited to a very small portion of the Project site. Noise from construction activities would occur over a much shorter duration than would those of the Proposed Project, and would generate impacts to a smaller, more confined surrounding area. Nonetheless, construction activities in the vicinity of residential units along Jefferson Boulevard could exceed the significance threshold for construction noise. The substantial reductions in land use intensity would also result in a reduction in noise levels associated with operation of on-site equipment and activity. The on-site equipment and activity noise levels associated with the Proposed Project are not considered significant and would be less so with this alternative. An expected reduction of 94 percent in traffic volumes associated

with this alternative would yield a notable reduction in comparison to Proposed Project traffic noise.

#### **4.2.2.F Light and Glare**

##### **4.2.2.F.(1) Natural Light – Shading**

Total building massing would be substantially reduced with this alternative and, thus, overall shading would be reduced. Depending on the building location, some shading could fall on off-site sensitive uses. However, potential shading would be limited by Specific Plan regulations. Overall, shading would be less than that of the Proposed Project and like the Proposed Project would be less than significant.

##### **4.2.2.F.(2) Artificial Light and Glare**

With reduced building massing, the overall amount of lighting would be reduced. The overall lighting profile and appearance would be less than the Proposed Project, and cause only an incidental effect on existing conditions. As with the Proposed Project, lighting and use of non-reflective materials could be controlled to limit effects on off-site uses, and impacts would be less than significant.

#### **4.2.2.G Land Use**

This alternative would avoid amendments to the Area D Specific Plan, and its zoning designations. The alternative would utilize only one to two acres of the 111.0 acre Project site, located within the M(PV) Zone. Otherwise, the Project site would remain in its current condition. Implementation of this alternative would not fulfill the planned use of the Project site as an activity center, and place for new population, and business activity (per regional plans – SCAG’s Regional Growth Management Plan and the City’s General Plan; and per the Area D Specific Plan). To the extent that potential Project population locates elsewhere, land use effects would be transferred to other locations, without the benefit of the mixed-use efficiencies associated with the Proposed Project. At the same time, the site would be only slightly modified and changes to the setting less than with the Proposed Project. In both cases, impacts would be less than significant.

#### **4.2.2.H Mineral Resources**

Potential mineral resource impacts would be similar to those of the Proposed Project, which were found to be not significant. There are no mineral (including petroleum) resources in the area of the Proposed Project site.

#### 4.2.2.I Safety/Risk of Upset

**Hazardous Materials Management.** The amount of development and associated grading would be considerably less under this alternative than under the Proposed Project. As such, safety hazards similar to those of the Proposed Project would be involved in the excavation and construction activities only for the proposed office uses near areas with known hazardous materials. Unlike the Proposed Project, no demolition of existing structures would be necessary, and therefore, no lead-based paint or asbestos hazards are anticipated under this alternative. As such, in areas to be developed with office uses, the impacts would be similar to those of the Proposed Project (which were found to not be significant), though overall, impacts under Alternative 2 would be substantially reduced relative to the Proposed Project.

Construction dewatering may be required during project development in areas proposed for office uses. As with the Proposed Project, dewatering discharge would be conducted in accordance with RWQCB requirements; therefore, the impacts would be substantially reduced overall (though similar on a site-by-site basis) relative to those of the Proposed Project, which were found to not be significant.

**Soil/Groundwater Contamination.** Much of the Project site was formerly occupied by industrial uses, particularly related to aircraft manufacturing, testing and repair (i.e., activities associated with the “Plant Site”). The vast majority of such uses occurred within the adjacent Playa Vista First Phase Project site east of the Proposed Project. Soil and groundwater contamination from past Plant Site activities was subsequently found in several areas, including some areas within the area of the Proposed Project: one area of known soil contamination, the former Temporary Drum Storage Area, has been remediated to the satisfaction of regulatory agencies and other areas are being, or will be, evaluated for remediation in conjunction with RWQCB’s Cleanup and Abatement Order No. 98-125. Therefore, in areas to be developed with office uses, the impacts would be similar to those of the Proposed Project, which were found to not be significant. Overall, however, based on the limited area to be developed, the impacts would be reduced considerably.

**Soil Gas.** Potential safety and risk of upset impacts associated with methane-related hazards for areas to be developed with office uses would be similar to those of the Proposed Project, which were found to be potentially significant; however, implementation of Project Design Features and other mitigation measures that would also apply to development under this alternative would reduce the impacts to a level that is less than significant. The results of the soil gas surveys completed in 1998 through 2001 found elevated levels of methane within shallow soils of the Project site. Such areas with elevated levels of methane are generally located in the southwest portion of the Project site (maximum concentration of 323,600 ppmv), although elevated levels of methane, ranging from approximately 13,000 ppmv to 44,400 ppmv, were detected in three other areas within the Project site. Only very low, if any, concentrations of

hydrogen sulfide, benzene toluene, ethylbenzene, and xylenes (BTEX) were detected within the area of the Proposed Project. The majority of samples were “non-detect” for hydrogen sulfide based on a detection limit of one part per billion and no BTEX was detected based on detection limits of 0.07 parts per billion by volume (ppbv). The maximum concentration detected for hydrogen sulfide and constituents of BTEX were 1.000 ppmv and 1.1 parts per million, respectively. These very low concentrations do not pose a significant health and safety risk. A comprehensive worker safety program specific to the potential for soil gases being encountered during grading and construction is proposed as a Project Design Feature, which is assumed to also apply to this alternative. With regard to methane-related safety/risk of upset impacts associated with long-term operation of the Proposed Project or this alternative, the application of a comprehensive methane management program as a Project Design Feature would serve to avoid significant impacts. The mitigation program would avoid significant health and safety impacts related to soil gas. Therefore, the impacts would be similar (i.e., less than significant) to those of the Proposed Project in development areas, but would be substantially reduced, given the limited development area relative to the Proposed Project.

**Aviation Hazards.** Potential safety/risk of upset impacts associated with aviation hazards would be similar to those of the Proposed Project, which were concluded to be less than significant. Operation of the two heliports currently permitted within the adjacent Playa Vista First Phase Project site could pose potential safety/risk of upset impacts on future development within the Project site. Under this alternative, the heliport currently permitted within the site would not be developed as is the case with the Proposed Project. Heliport No. 1, located to the east of the Project site, poses a negligible risk, as its western flight path passes the area of the Proposed Project to the northeast and never crosses the site. Likewise, Heliport No. 2 poses a negligible risk to proposed office uses, as the limited area to be developed under this alternative would likely not interfere with the heliport flight paths. Nonetheless, should the height of a new office building in the Proposed Project extend into the subject air space and result in a conflict with operation of the heliport, the heliport is required to modify its flight path to eliminate the conflict or cease operations. Elimination or avoidance of such a conflict could be achieved if the heliport is relocated to a new suitable site or if the heliport is operated from the rooftop of a building. As such, given the substantial reduction of developed area relative to the Proposed Project, the potential for safety/risk of upset impacts from heliport operations is considerably less than of the Proposed Project, which were found to be less than significant.

#### **4.2.2.J Population, Housing and Employment**

Under this alternative, no residential, retail or community-serving development would take place and no population or housing increases would occur. That portion of sub-regional population growth that would be served by the Proposed Project would likely locate at other dispersed sites within the sub-region. The office uses that would occur would be reduced 38 percent. Total employment would be 216 jobs. A comparison of the resulting amounts of

employment, housing and population with those of the Proposed Project is presented in Table 188 on page 1287.

The addition of new employment, without housing would cause an exacerbation in the current imbalance of jobs to housing in the sub-region. This alternative would not provide the housing and resulting beneficial improvements in the local and subregional jobs/housing ratio that would occur with the Proposed Project. (The Proposed Project would reduce the ratio to 2.43 in the Local Area, whereas the alternative would increase it to 2.67.) The new employment associated with this alternative would fall within the growth range anticipated for the sub-region in the Growth Management Plan.

#### **4.2.2.K Transportation**

##### **4.2.2.K.(1) Traffic and Circulation**

This alternative generates 1,568 daily trip ends, representing 94 percent fewer trips than the Proposed Project's 24,220 trips. During the morning and evening peak hours, this alternative generates 223 and 220 trips respectively. This contrasts with 1,626 trips and 2,302 trips for the Proposed Project for the respective peak hours. This represents 86 percent and 90 percent fewer trips than the Proposed Project in the morning and evening peak hours, respectively. Trip generation provides a general indication of impacts on CMP intersections, freeway links, and public transit. Therefore, generally speaking, proportionate decreases would occur in each of these impact areas.

In order to provide a more detailed evaluation regarding traffic and circulation, an analysis of this alternative has been prepared to determine the number of trips generated and the impacts on roadway service levels at the 218 intersections analyzed in this EIR (See the Village at Playa Vista Traffic Report, Appendix K of this EIR). This analysis and its following summary are based on impacts prior to mitigation. Per this analysis, the alternative produces significant traffic impacts at approximately 1 percent and 0 percent of the analysis locations in the A.M. and P.M. peak hours, respectively, compared to 14 percent and 22 percent of the locations impacted by the Proposed Project during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a lesser degree than the Proposed Project. Analysis of the transportation system operating conditions in the future with the Project alternative reveals the following system performance characteristics in relation to those with the Proposed Project:

- The average volume capacity (V/C) ratio (or demand to capacity ratio) of the system would decrease to 0.830 and 0.862 during the A.M. and P.M. peak hours, respectively,

Table 188

**ALTERNATIVE 2: POPULATION, HOUSING AND EMPLOYMENT****Housing and Population**

	<b>Dwelling Units</b>	<b>Average Household Size</b>	<b>Population</b>
Alternative 2	0	2.2	0
Proposed Project	<b>2,600</b>	<b>2.2</b>	<b>5,720</b>
<b>+/- Compared to the Proposed Project</b>	<b>-2,600</b>		<b>-100%</b>

**Employees**

	<b>Office – Commercial Employment</b>						<b>Total Employment</b>
	<b>Office <sup>a</sup></b>		<b>Retail <sup>b</sup></b>		<b>Community-Serving <sup>c</sup></b>		
	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	
Alternative 2	108,050	216	0	0	0	60	216
Proposed Project	175,000	700	150,000	400	40,000	80	<b>1,180</b>
<b>+/- Compared to the Proposed Project</b>							<b>-82%</b>

<sup>a</sup> Calculated by using a factor of 250 sq.ft. per employee.

<sup>b</sup> Calculated by using a factor of 375 sq.ft. per employee.

<sup>c</sup> Calculated by using a factor of 500 sq.ft. per employee.

Source: PCR Services Corporation.

compared to the average V/C ratio of 0.842 and 0.880 respectively, during the same peak hours for the Proposed Project.<sup>600</sup>

- Approximately 83 and 104 of the 218 analyzed intersection locations are projected to operate at unacceptable levels of service (LOS E or F) during the A.M. and P.M. peak hours, respectively, compared to 90 and 108 locations operating at unacceptable LOS E or F with the Proposed Project.
- The above two operating conditions, however, should be viewed in light of the fact that the 2010 base conditions analysis reveals that the average system V/C ratio without the Project is projected to be 0.833 and 0.867 during the A.M. and P.M. peak hours, respectively. Further, the number of intersection locations in 2010 base conditions that are projected to be operating at an unacceptable LOS E or F would be 84 and 104 during the A.M. and P.M. peak hours, respectively. Therefore, relative to

<sup>600</sup> The analysis of traffic impacts for the Alternatives assumed that the roadway improvements that are Project Design Features for the Proposed Project (e.g. improvements along Jefferson Boulevard and Bluff Creek Drive) would be implemented for all of the on-site Alternatives. The combination of these improvements with the additional traffic from Alternative 2 would result in a net V/C ratios that reflect improved traffic conditions.

2010 base conditions, this alternative results in 1 and 0 less LOS E or F locations during the A.M. and P.M. peak hours, respectively, as opposed to 6 and 4 more LOS E and F intersections with the Proposed Project during the same peak hours.

It is expected that implementation of this alternative would include a mitigation program to reduce potentially significant impacts. With fewer trips, this alternative would require a reduced traffic mitigation program.

#### **4.2.2.K.(2) Parking**

As with the Proposed Project, the parking needs for this alternative would be met through the application of the standards and review procedures established in the Area D Specific Plan, and no significant impacts would occur. The traffic mitigation measures for this alternative would be limited and would likely not result in the need for restricted parking along Centinela Avenue as would those of the Proposed Project. However, as with the Proposed Project, no significant parking impacts would occur.

#### **4.2.2.K.(3) Bicycle Plan**

Under this alternative, no improvement to the existing bikeway network would occur and no new bikeways or connections would be developed. Implementation of this alternative would not adversely impact bicycle plans and service, but would not provide the beneficial impacts of the Proposed Project.

#### **4.2.2.L Public Services**

##### **4.2.2.L.(1) Fire Protection**

The Project site would be served either through the current facilities and/or construction of the new station on a dedicated site within the adjacent Playa Vista First Phase Project. This alternative would generate no new residents and 216 employees. Based on the current service level of 56 emergency incidents per 1,000 residents and employees, approximately 11 emergency incidents would occur on an annual basis. This is 354 emergency incidents (97 percent) less than the 366 emergency incidents occurring under the Proposed Project. Therefore, the impacts on fire protection services would be less than under the Proposed Project. Potential revenues to pay for services would also be reduced proportionately.

#### 4.2.2.L.(2) Police Protection

Development occurring under this alternative would be served through the same facilities as the Proposed Project. This alternative would result in a population increase of 216 employees, and no new residents. In order to maintain the LAPD Pacific Area current service level of 1.17 police officers per 1,000 residents and employees, approximately one quarter of a police officer with associated equipment would be required to provide police protection and to maintain the existing service level. This is 7.75 officers less than the 8 officers required by the Proposed Project. Therefore, the impacts on police protection services would be less than significant as compared to the Proposed Project, which would have a significant impact. Potential revenues to pay for services would also be reduced proportionately.

#### 4.2.2.L.(3) Schools

The alternative would generate a total of twelve public school students distributed as follows: six elementary students, three junior high school students, and three high school students.<sup>601</sup> These amounts are less than those associated with the Proposed Project by 298, 142 and 164 students, respectively.

There is sufficient capacity to accommodate the students generated by this alternative at Playa del Rey Elementary School alone, without the availability of the Playa Vista Elementary School anticipated to be opened in the adjacent Playa Vista First Phase Project. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Playa del Rey Elementary School.

The three junior high school students generated by this alternative could be accommodated within Marina del Rey Middle School, the junior high school which serves the Project site. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Marina del Rey Middle School.

The three high school students generated by this alternative would attend Venice High School. The high school students that would be generated by this alternative would not exceed

<sup>601</sup> The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project. See Table 142 on page 1011.

<i>Housing:</i>		<i>Employment:</i>	
<i>Elementary</i>	<i>N/A</i>	<i>Elementary</i>	<i>0.026</i>
<i>Junior High</i>	<i>N/A</i>	<i>Junior High</i>	<i>0.012</i>
<i>High School</i>	<i>N/A</i>	<i>High School</i>	<i>0.012</i>



the forecasted unused capacity at Venice High School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Venice High School.

#### **4.2.2.L.(4) Parks and Recreation**

Under this alternative, no new residential development would occur and only incidental employment population would be introduced to the site. No demand for parks space would be created. At the same time, this alternative would not provide the park space associated with the Proposed Project; and this alternative would result in less per capita open space and recreational facilities in the area than would occur under the Proposed Project.

#### **4.2.2.L.(5) Libraries**

Under this alternative, no development of residential uses would occur and no additional population would be introduced to the site. No demand for libraries would be created, and impacts would be less than with the Proposed Project.

#### **4.2.2.M Energy Consumption**

Under this alternative, an estimated 3.834 MWh of electricity and 7.105 kef of natural gas would be consumed on a daily basis, as shown in Table 189 on page 1291. This would represent approximately 92.8 percent less electrical, and 98.5 percent less natural gas, consumption than the Proposed Project. This is a substantially lower level of consumption than that associated with the Proposed Project. However, as with the Proposed Project, this alternative would have less-than-significant impacts on energy consumption.

#### **4.2.2.N Utilities**

##### **4.2.2.N.(1) Water Consumption**

Average daily potable water consumption under this alternative would be about 0.018 million gallons per day (mgd) as shown in Table 190 on page 1291 as compared to 0.503 mgd for the Proposed Project. Overall, Alternative 2 would generate 96.4 percent less potable water demand than the Proposed Project and therefore would have a less-than-significant smaller adverse impact. As summarized in Table 191 on page 1292, reclaimed water usage under Alternative 2 would be 0.006 mgd, which is 88.2 percent less than the 0.051 mgd of reclaimed water consumption associated with the Proposed Project.

Table 189

**ALTERNATIVE 2: ESTIMATED DAILY ENERGY CONSUMPTION**

Demand Source	Quantity (Units)	Electricity		Natural Gas	
		Factor <sup>a</sup>	Consumption (MWh)	Factor <sup>b</sup>	Consumption (kcf)
Office	108.05 ksf	12.95 kWh/sf/year	3.834	2000.0 cf/ksf/month	7.105
<b>Total Alternative 2</b>			<b>3.834</b>		<b>7.105</b>
<b>Total Proposed Project</b>			<b>53.007</b>		<b>484.728</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-92.8%</b>		<b>-98.5%</b>

ksf = thousand square feet  
kcf = thousand cubic feet

d.u. = dwelling unit  
sf = square feet

kWh = kilowatt-hour  
cf = cubic feet

MWh = Megawatt-hour

<sup>a</sup> Electricity consumption factors based on Table A9-11-A of SCAQMD *CEQA Air Quality Handbook* (April 1993). Daily consumption was calculated using the annual factor divided by 365 days.

<sup>b</sup> Natural Gas consumption factors based on Table A9-12-A of SCAQMD *CEQA Air Quality Handbook* (April 1993) for monthly gas consumption. Daily consumption was calculated using monthly consumption factor multiplied by 12 and divided by 365 (~ 30.41 days/month).

Source: Camp Dresser & McKee, Inc., 2003.

Table 190

**ALTERNATIVE 2: ESTIMATED DAILY POTABLE WATER CONSUMPTION**

Demand Source	Quantity (Units)	Factor <sup>a</sup>	Consumption (mgd)
Office	108.05 ksf	0.000165 mgd/ksf	0.018
<b>Total Alternative 2</b>			<b>0.018</b>
<b>Total Proposed Project</b>			<b>0.503</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-96.44%</b>

ksf = thousand square feet    d.u. = dwelling unit    mgd = million gallons per day

<sup>a</sup> Water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, wastewater generation factors. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses.

Source: Camp Dresser & McKee, Inc., 2003.

Table 191

**ALTERNATIVE 2: ESTIMATED DAILY RECLAIMED WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor</b>	<b>Consumption (mgd)</b>
Office Cooling Towers	108.05 ksf	32 gpd/ksf <sup>a</sup>	0.004
Office Toilets	108.05 ksf	21 gpd/ksf <sup>a</sup>	0.002
Landscaping	0 acres	3,650 gpd/acre <sup>b</sup>	0.000
<b>Total Alternative 2</b>			<b>0.006</b>
<b>Total Proposed Project</b>			<b>0.051</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-88.2%</b>

*ksf = thousand square feet      gpd = gallons per day      mgd = million gallons per day*

<sup>a</sup> *Reclaimed water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, based on 4 employees per 1,000 sq.ft. of office space.*

<sup>b</sup> *Landscape irrigation demand factor from Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992.*

*Source: Camp Dresser & McKee, Inc., 2003.*

**4.2.2.N.(2) Wastewater**

Wastewater generation under this alternative would be about 0.022 mgd as shown in Table 192 on page 1293 as compared to 0.467 mgd for the Proposed Project. Based on the comparative difference in the nature and amount of land proposed, Alternative 2 would have less wastewater generation from office, residential, retail and community-serving uses. Overall, Alternative 2 would generate 95.3 percent less wastewater than the Proposed Project. As with the Proposed Project, this alternative would have a less-than-significant impact on wastewater consumption.

**4.2.2.N.(3) Solid Waste**

Solid Waste generation under this alternative would be about 0.324 tpd, as shown in Table 193 on page 1293 as compared to about 18.917 tpd net for the Proposed Project. Overall, this alternative would generate 98.3 percent less solid waste generation compared to the Proposed Project. As with the Proposed Project, this alternative would have a significant impact on solid waste generation.

Table 192

**ALTERNATIVE 2: ESTIMATED DAILY WASTEWATER GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (mgd)</b>
Office	108.05 ksf	0.000203 mgd/ksf	0.022
<b>Total Alternative 2</b>			<b>0.022</b>
<b>Total Proposed Project</b>			<b>0.467</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-95.3%</b>

ksf = thousand square feet    d.u. = dwelling unit    mgd = million gallons per day

<sup>a</sup> Wastewater generation factors from City of L.A. Draft Citywide CEQA Technical Guide. Wastewater generation factors are equal to 90 percent of water consumption factors, to account for surface infiltration and evaporation losses. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses, where reclaimed water is used for cooling towers and toilets, yielding a factor of 203 gpd/ksf or gpd/du.

Source: Camp Dresser & McKee, Inc., 2003.

Table 193

**ALTERNATIVE 2: ESTIMATED DAILY SOLID WASTE GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (tpd) <sup>b</sup></b>
Office	108.05 ksf	0.003 tpd/ksf	0.324
<b>Total Alternative 2</b>			<b>0.324</b>
<b>Total Proposed Project</b>			<b>18.917</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-98.3%</b>

ksf = thousand square feet    d.u. = dwelling unit    tpd = tons per day

<sup>a</sup> Solid waste generation factors based on the California Integrated Waste Management Board website, Waste Characterization database: [www.ciwmb.ca.gov/WasteChar/WasteGenRates](http://www.ciwmb.ca.gov/WasteChar/WasteGenRates). November, 2001.

<sup>b</sup> Solid waste generation presented in this table is prior to waste diversion, which would substantially reduce the amount of this waste requiring landfill disposal.

Source: Camp Dresser & McKee, Inc., 2003.

**4.2.2.O Visual Qualities (Aesthetics and Views)**

**Aesthetics.** This alternative would place a relatively small amount of development at an isolated location within the Proposed Project site. It would leave the appearance of the site mostly unaltered, in an undeveloped state. The new building would be similar in appearance to other office buildings in the area, as is the case with the office buildings that could occur with the

Proposed Project. This alternative would not result in a substantial loss of undeveloped land, avoiding the significant impact associated with the Proposed Project.

**Views.** This alternative would place a relatively small amount of development at an isolated location within the Proposed Project site. The placement of the new building(s) would likely cause some loss of views of the bluffs for travelers and private uses along Jefferson Boulevard. However, the extent of the view loss would be confined to a much smaller portion of affected area than the Proposed Project. Unlike the Proposed Project, the loss of this view would be considered not substantial, and less than significant. The impacts on views from other locations would be substantially less than with the Proposed Project.

#### **4.2.2.P Cultural Resources**

##### **4.2.2.P.(1) Paleontological Resources**

Construction related activities, such as grading and excavation, could result in direct impacts on paleontological resources by covering or destroying fossiliferous rock units or exposing fossil bearing rock units to unauthorized collecting. At the same time, discovery of artifacts could occur with mitigation that would not otherwise occur. The amount of disturbed ground cover with this alternative would be substantially less than that of the Proposed Project. As with the Proposed Project, impacts would be less than significant.

##### **4.2.2.P.(2) Archaeological Resources**

Construction related activities could disturb, destroy, or remove archaeological sites or artifacts and expose such resources to theft and vandalism. At the same time, collection, study and archiving of such artifacts could result from mitigation measures that would be implemented with a development program. As with the Proposed Project, impacts would be less than significant.

##### **4.2.2.P.(3) Historical Resources**

Under this alternative, the existing structures located on the southern portion of the site would not be demolished. These structures would likely remain until another use is applied to the site. However, these structures are not considered historical resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

### **4.2.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative impacts between this alternative and the Proposed Project is presented in Table 194 on pages 1296 through 1299. The No Project –Development Permitted by the Existing Specific Plan and Zoning Alternative would eliminate the Proposed Project’s significant adverse impacts on Aesthetics and Views. The alternative would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project. Alternative 2 would also reduce the Proposed Project’s non-significant impacts on local air quality and noise from operations, public services, biotic resources, safety/risk of upset, energy, and utilities. As with the Proposed Project, there would be no impacts on mineral or historic resources. There would be a 100 percent reduction in total housing capacity and an 82 percent reduction in employment. Therefore, this alternative would not provide housing and employment opportunities anticipated in the Specific Plan, and would exacerbate the imbalance in the jobs/housing ratio in the local and sub-regional areas.

### **4.2.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

The No Project – Development Permitted by the Existing Specific Plan and Zoning Alternative would not attain any of the Applicant’s basic Project objectives for the Proposed Project. It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing and recreational activities of a substantial scale and magnitude. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and the City’s need for housing Citywide and in the Westside, in particular. This alternative would not implement the proposed programs for resource protection, enhancement, conservation, and reuse.

Table 194

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 2 (NO PROJECT-PERMITTED DEVELOPMENT)  
TO THE PROPOSED PROJECT\***

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Non-Significant	Beneficial	Better/Worse	Less grading would occur/no stabilization of bluffs.
Dewatering/Subsidence	Non-Significant	Non-Significant	Better/Similar	Less dewatering and no potential for subsidence.
Seismic Hazards	Non-Significant	Non-Significant	Better	No new residents and fewer employees exposed to seismic activity.
Slope Stability	No Impact	Non-Significant	Worse/Similar	Loss of beneficial stabilization of bluffs/no potential for exposure of residents to risk.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Better	Fewer contributions to emissions level.
Construction/Local Emissions	Non-Significant	Non-Significant	Better	Fewer contributions to emissions level.
Operations/Regional Emissions	Non-Significant	Significant	Better	Fewer contributions to emissions level.
Operations/Local Emissions	Non-Significant	Non-Significant	Better	Fewer contributions to emissions level.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Reduced runoff. Similar improvements to storm drain system limited to a small development area. No completion of Riparian Corridor.
Groundwater	Non-Significant	Non-Significant	Similar	Less landscape irrigation and permanent dewatering.
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Lower additional urban runoff. No completion of Riparian Corridor.
Groundwater	Non-Significant	Non-Significant	Better	Lower potential to affect groundwater.
<b>Biotic Resources</b>				
Plant Life	Non-Significant	Beneficial	Worse	Habitat degradation would likely continue through succession. No habitat enhancement without the completion of the Riparian Corridor.
Animal Life	Non-Significant	Beneficial	Worse	Habitat degradation would likely continue through succession.

Table 194 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 2 (NO PROJECT –PERMITTED DEVELOPMENT)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Noise</b>				
Construction	Significant	Significant	Better	Less construction.
Stationary	Non-Significant	Non-Significant	Better	Fewer new stationary sources.
Mobile	Non-Significant	Non-Significant	Better	Fewer new mobile sources.
<b>Light and Glare</b>				
Natural Light – Shading	Non-Significant	Non-Significant	Better	Less development to generate shadows.
Artificial Light and Glare	Non-Significant	Non-Significant	Better	Less alterations to nighttime appearance of site.
<b>Land Use</b>				
Regulatory	Non-Significant	Non Significant	Better/Worse	No additional land use actions required. Plans for regional centers would remain in effect. Would not achieve planning goals for in-fill development, but would maintain undeveloped area.
Land Use Pattern	Non-Significant	Non Significant	Better	Would avoid changes to the setting.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Similar	No mineral resources exist on-site.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Better	Less new construction and lower exposure to risk.
<b>Population, Housing and Employment</b>				
Population	No Impact	Non-Significant	Worse	Projected sub-regional population not served.
Housing	No Impact	Beneficial	Worse	Loss of 2,600 units and housing choices.
Employment	Non-Significant	Beneficial	Worse	Loss of 1,120 employment opportunities.
Jobs/Housing Bal.	Non-Significant	Beneficial	Worse	Current and projected unfavorable jobs/housing balance not served. The imbalance at a ratio of 2.66, would increase to 2.67, and would be exacerbated.



Table 194 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 2 (NO PROJECT –PERMITTED DEVELOPMENT)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Transportation</b>				
Traffic and Circulation	Non-Significant	Significant	Better	Less new traffic.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated.
Bicycle Plan	No Impact	Beneficial	Worse	No new bikeways.
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Better	Less demand with proportionately less revenue.
Police Protection	Non-Significant	Significant	Better	Less demand with proportionately less revenue.
Schools	Non-Significant	Non-Significant	Better	Less student generation that can be accommodated with existing LAUSD facilities.
Parks and Recreation	Non-Significant	Non-Significant	Worse	No new parks or improved open space.
Libraries	Non-Significant	Non-Significant	Better	Less demand with proportionately less revenue.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Better	92.8 percent less electricity and 98.5 percent less natural gas demand.
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Better	96.4 percent less daily potable water consumption and 88.2 percent less reclaimed water consumption.
Wastewater	Non-Significant	Non-Significant	Better	95.3 percent less wastewater generation.
Solid Waste	Significant	Significant	Better	98.3 percent less solid waste generation. Any exacerbation in demand is considered significant.
<b>Visual Qualities (Aesthetics and Views)</b>				
Aesthetics	Non-Significant	Significant	Better/Worse	Less new development in existing undeveloped area; benefits of new landscaping would not occur.
Views	Non-Significant	Significant	Better	Existing views maintained, for the most part.

Table 194 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 2 (NO PROJECT –PERMITTED DEVELOPMENT)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative</b>	<b>Proposed Project</b>	<b>Comparison</b>	<b>Result of Development of the Alternative</b>
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Better/Worse	Less potential disruption of resources/less potential discovery of artifacts, per mitigation program
Archaeological Resources	Non-Significant	Non-Significant	Better/Worse	Less potential disruption of resources/less potential discovery of artifacts, per mitigation program.
Historical Resources	No Impact	No Impact	Similar	In either case, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## 4.3 ALTERNATIVE 3: EXISTING SPECIFIC PLAN – BUILDOUT

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### 4.3.1 INTRODUCTION

This alternative would include the amounts of development that could occur under the Area D Specific Plan use limitations, after development of the adjacent Playa Vista First Phase Project, and zone boundaries within the Specific Plan were amended. After First Phase development, there remains 1,758,050 sq.ft. of office space; 615,000 sq.ft. of retail space and 600 hotels rooms.<sup>602</sup> Further, the District and Specific Plans anticipate, and allow, community-serving uses beyond these remaining development components. Accordingly, it is assumed that 20,000 sq.ft. of community-serving uses would occur under this Alternative.<sup>603</sup> Compared to the Proposed Project, these variations result in a development program without a residential component, with a hotel component, with increases in office and retail uses of 905 percent and 310 percent, respectively, and with a decrease in community-serving uses of 50 percent. It is assumed that this alternative would include implementation of the riparian corridor and the bluff face restoration, similar to that of the Proposed Project. The comparison of this alternative with the Proposed Project is presented in Table 195 on page 1301 for each major land use and related project components.<sup>604</sup>

This alternative would also vary in the design guidelines that would be applicable to development. For example, under this alternative, buildings with a height limit of 240 feet above finished grade (approximately 260 feet AMSL) would be permitted with the height of the buildings on 10 percent of the area limited only by flight regulations, allowing for even taller buildings. By contrast, the Proposed Project includes limited heights with a maximum height of 112 feet AMSL (or approximately 85 feet to 89 feet above finished grade), well below the

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<sup>602</sup> Remaining office space is located within the M(PV) and C2(PV) zones. The remaining retail space and the hotel rooms are located within the C2(PV) zone. Implementation of this alternative would require an adjustment in the boundaries of the zone areas or zone changes. Such adjustment is discussed in the land use analysis of this alternative, below.

<sup>603</sup> For example, under the Westchester-Playa del Rey District Plan, the following recommendation for future public facilities is provided at page WP-4: “The public facilities such as libraries and parks indicated in this Plan shall be developed in accordance with Citywide standards for need, site area, design, and location, as expressed in the Service-System Element of the General Pan. (See individual Elements for specific standards). Such development should be sequenced and timed so as to provide a workable, efficient and adequate balance between land use and service facilities at all times.” Since Alternative 3 does not include a residential component, it is assumed that the demand for community-serving uses would be less than that of the Proposed Project.

<sup>604</sup> Impact comparisons for all topics other than Traffic and Circulation are based on impacts prior to mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.

Table 195

**COMPARISON OF ALTERNATIVE 3 COMPONENTS:  
AREA D SPECIFIC PLAN TO THE PROPOSED PROJECT**

<b>Project Component</b>	<b>Unit</b>	<b>Alternative Project</b>	<b>Proposed Project</b>	<b>Numerical Difference</b>	<b>Percent Change</b>
Office	NSF	1,758,050	175,000	+1,583,050	+905%
Retail	NSF	615,000 <sup>a</sup>	150,000	+615,000	+310%
Community-Serving <sup>b</sup>	GSF	20,000	40,000	-20,000	-50%
Hotel	rooms	600	0	+600	(NA)
Housing	units	0	2,600	-2,600	-100%
Active Recreation (Parks)	acres	0	12.4	-12.4	-100%

*NSF = net square feet      GSF = gross square feet*

<sup>a</sup> *Includes 600,000 sq.ft. of retail space in the C2(PV) zone plus 50,000 NSF permitted in the Playa Vista Mixed-Use zone.*

<sup>b</sup> *Assumes that community-serving uses would occur at a rate that is 50 percent that of the Proposed Project. The existing District Plans anticipate development of community-serving uses, commensurate with development.*

*Source: PCR Services Corporation, 2002.*

average height of the bluffs (approximately 140 feet AMSL). Further, this alternative would not include lot coverage restrictions, as does the Proposed Project.

For each environmental subject area a comparative determination is made as to whether the overall mitigated adverse environmental impacts of this alternative would be better, similar to, or worse, than the corresponding Proposed Project impacts. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation. These comparisons are summarized at the end of this alternative analysis in Table 202 on page 1320.

## 4.3.2 ANALYSIS

### 4.3.2.A Earth

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

**Grading.** Development of the site under this alternative may require an increase in excavation and grading activities compared to the Proposed Project, depending on the design and

placement of structures. The lack of building height restrictions in some areas could also result in the construction of taller buildings than in the Proposed Project. Taller buildings could require more extensive footings and foundations, which would, in turn, require more extensive excavation and grading. The stabilization of the bluffs, a beneficial impact likely to be required under this alternative, would necessitate grading on the bluffs comparable to the Proposed Project. Furthermore, under this alternative, similar to the Proposed Project, erosion control measures would be employed during grading and all construction phases to minimize erosion/sedimentation impacts. In summary, development of this alternative could result in greater grading impacts than those of the Proposed Project. However, these impacts would not be expected to be significant since appropriate mitigation measures would be applied to secure public safety.

**Dewatering/Subsidence.** Because of the shallow water level conditions which exist throughout the Proposed Project site, dewatering is likely to be required in certain areas requiring subsurface excavation, although this is dependent upon the actual construction techniques employed. Any dewatering which becomes necessary for development construction or for excavation would be done in accordance with dewatering permits issued by the Regional Water Quality Control Board (RWQCB). Prior to initiating any construction dewatering activities that are not included within the scope of the current Permit provisions, the Applicant/Contractor would be required to update the plans and provisions related to the Permit and notify the State Water Resources Control Board (SWRCB), of any such plan/provisions modifications. Ongoing, or permanent, dewatering that may occur as part of this Alternative, such as relates to ongoing groundwater remediation activities and dewatering of sumps in subterranean structures (e.g., for subterranean parking and for methane safety systems), is not anticipated to be substantial relative to construction dewatering. Furthermore, Group Delta Consultants, Inc. concluded that operation of dewatering systems for subterranean parking and the methane safety systems would not result in any net subsidence at the Proposed Project site.<sup>605</sup> As such, similar to the Proposed Project, dewatering activities from construction activities and from operation of proposed uses under this alternative are not anticipated to result in any net subsidence at the Proposed Project site, and a less-than-significant impact is anticipated.

**Seismic Hazards.** With regard to groundshaking and fault rupture hazards, buildings and other improvements constructed under this alternative would be subject to the same City building and seismic codes as the Proposed Project, producing similar protection from seismic activity.

As pertains to tsunami and seiche hazards under Alternative 3, all minimum finished pad and street elevations of this alternative would be above tsunami limits, as would those of the

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<sup>605</sup> *Group Delta Consultants, Inc., Evaluation of Subsidence Due to Lowering of Groundwater, Village at Playa Vista, Playa Vista Development, Playa Vista Project. April 15, 2003.*

Proposed Project; hence, tsunamis are unlikely to significantly affect development within the site. No water bodies with the potential to present seiche hazards to the project site exist in close proximity; as such, no seiche hazard would occur.

In order to avoid possible liquefaction (i.e., settlement) resulting in structural damage, structures would be designed to resist these effects and/or the underlying soils would be properly prepared. In the application of City structural engineering standards, liquefaction must be considered during structural design. Therefore, with the provisions required by City building and safety requirements and by the Uniform Building Code, people occupying the facilities would be protected, and damage would be minimized. No significant adverse impacts from liquefaction to future structural uses is indicated due to required compliance with existing prerequisites for building permit issuance.

Impacts from ground lurching (i.e., the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks) would only affect the bluffs along the southern edge of the Proposed Project site. However, due to the geology and overall stability of the bluffs, lurching of the bluff face is not expected to occur. Given the level of development proposed under this alternative, potential ground lurching impacts would essentially be the same as those for the Proposed Project.

**Slope Stability.** Similar to the Proposed Project, the potential for slope stability is only a potential hazard along the southerly boundaries adjacent to the bluffs. If development were to be setback from the slope, as would occur under the Proposed Project, the potential slope stability impacts would be minimized. Also, the portions of the slopes below Cabora Road identified as having the potential for slope stability problems would be repaired in conjunction with construction of the Riparian Corridor. The stabilization of the slopes below Cabora Road would achieve an acceptable factor of safety. The Riparian Corridor designed for the adjacent Playa Vista First Phase Project is proposed to be connected through the Proposed Project site. Similar to the Proposed Project, the Riparian Corridor would provide additional distance between the bluffs and buildings constructed on-site. The Riparian Corridor is considered a beneficial impact.

#### 4.3.2.B Air Quality

The amount of site preparation under this alternative may require an increase in excavating and grading activities and similar construction compared to the Proposed Project.<sup>606</sup>

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<sup>606</sup> All calculations used in this analysis are presented in Appendix E, Air Quality Technical Appendices, of this EIR.

However, pollutant emissions and fugitive dust from excavating and grading activities would be similar on a daily basis, as the duration and not the intensity of these activities could increase compared to the Proposed Project. Therefore, regional construction emissions would be similar to the Proposed Project and would likewise be significant for criteria pollutants. Local emissions dispersion would also be similar to the Proposed Project as the duration of excavation and grading would be greater but not the daily activity, and would not be significant.

The number of daily trips generated by this alternative would be 60 percent greater than the Proposed Project, resulting in proportionate increases in mobile air quality impacts. The total contributions to regional emissions under this alternative would be significant, as was the case with the Proposed Project. The increase in traffic by 14,476 daily trip ends associated with this alternative would contribute to a proportionate increase in localized emissions of carbon monoxide. The maximum predicted carbon monoxide concentration for the Proposed Project combined with 2010 base traffic was 7.1 ppm or 21 percent below the 9.0 ppm significance threshold for localized carbon monoxide. The Proposed Project resulted in approximately 6 percent of the pollutant concentration or 0.4 ppm. Therefore, a 60 percent increase in daily trips generated by this alternative would increase the increment from 0.4 ppm to 0.6 ppm and would be approximately 19 percent below the 9.0 ppm significance threshold for localized carbon monoxide. Hence, mobile source air quality impacts from this alternative would also be less than significant.

### **4.3.2.C Water Resources**

#### **4.3.2.C.(1) Hydrology**

**Surface Water.** Impacts related to surface water hydrology would generally be similar to those of the Proposed Project. With development of the site under the existing Specific Plan, the amount of impervious acres would be increased over the existing conditions, thereby changing the volume, velocity and routing of stormwater runoff. The amount of buildable area under this alternative is greater than under the Proposed Project, so there would be increased amounts of surface runoff during storm events, although the exact amount of impervious area and the resulting runoff would be dependent on the design and placement of structures. As with the Proposed Project, it is anticipated that the storm drain system would be designed to accommodate a 50-year design storm, in accordance with City requirements. In addition, the same design features would be incorporated to accommodate the increased runoff and provide an appropriate level of on-site flood protection, detention, and drainage. Flood protection measures would include additions and improvements to the existing storm drain system and the provision of stormwater retention facilities (Freshwater Marsh and Riparian Corridor) within the adjacent Playa Vista First Phase Project and Proposed Project sites. Alternative 3 proposes a different mix of land uses than the Proposed Project, although the amount of buildable land would be slightly increased, and the subsequent amount of impervious surfaces resulting from Alternative

3 would be proportionately increased relative to the Proposed Project. As such, despite increased impervious surface area and associated increased runoff volumes, stormwater infrastructure would be designed and constructed to adequately convey increased flows, and therefore no significant impacts related to flooding or flood control are anticipated from development under this alternative.

**Groundwater.** The increase in impervious surfaces compared to existing conditions poses the potential to reduce groundwater recharge. Alternative 3 would increase the amount of buildable land and the subsequent amount of impervious surfaces than the Proposed Project, impacts related to groundwater hydrology would be worse. Construction-related dewatering for subsurface excavation would be temporary and is not expected to have any long-term effects. Permanent, ongoing dewatering activities during project operation (such as would be required for subterranean parking and for methane safety systems) would be similar to, or possibly more extensive than, that associated with the Proposed Project (depending on the proposed depth of subterranean parking and methane safety systems associated with this alternative), although the impact (like the Proposed Project) is anticipated to be less than significant relative to groundwater hydrology. No significant impacts to groundwater recharge and hydrology are expected to occur.

#### 4.3.2.C.(2) Water Quality

**Surface Water.** Similar to the Proposed Project, the surface water quality under Alternative 3 could potentially be impacted both temporarily by construction activities and long term by activities associated with the proposed land uses. As under the Proposed Project, the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and appropriate best management practices (BMPs) during construction would reduce the impacts to water quality to less than significant. However, Alternative 3 would have more project components that would increase the amount of impervious surface (more office/retail and no parks). This alternative would be characterized by an increase in impervious surface and uses that generate runoff with potentially higher pollutant concentrations than the Proposed Project. Potential water quality impacts on surface water would be worse than that of the Proposed Project; however, with the implementation of Project Design Features and mitigation measures, the impacts are not expected to be significant.

**Groundwater.** Similar to the Proposed Project, groundwater quality is not expected to be significantly impacted by the development of Alternative 3. Groundwater resources could potentially be impacted by short-term construction activities and long-term changes in land use and recharge patterns. Short-term effects would be minimized due to the implementation of a SWPPP, the associated BMPs included in the plan, and compliance with NPDES requirements for dewatering. No long-term effects are anticipated because no industrial development is planned for the project; any uses that involve storage of fuel or other hazardous material would



be regulated under local, state, and federal laws. Although greater buildable area would allow for increased impervious surfaces, and a proportional reduction in groundwater recharge potential, water quality impacts on groundwater would, in general, be similar to the Proposed Project and would not be significant.

#### **4.3.2.D Biotic Resources**

Development of the Proposed Project to the maximum limits permitted under the existing Specific Plans would not significantly differ from the direct impacts associated with the implementation of the Proposed Project. This alternative, in general, would allow more office, retail and hotel uses and less residential and open space than the Proposed Project. However, the various use categories would occupy a similar land area.

Modifications to land uses under this alternative may incrementally reduce indirect impacts. Indirect impacts including increases in human use in adjacent natural areas, increased human and domestic animal presence, and increases in the number of exotic and non-native plant species present in natural areas are generally associated with residential rather than office, hotel or retail land uses due to the associated resident population. Therefore, reductions in residential uses proposed as part of this alternative, combined with an associated increase in commercial uses has the potential to incrementally reduce indirect impacts associated with increased human presence and use of natural areas by domestic animals, and increases in non-native plants peripheral to natural areas. At the same time, commercial uses and/or a hotel in proximity to the Project's natural areas could increase noise and lighting impacts, but not sufficiently to off-set the reductions in impacts associated with the reduced residential uses. Therefore, similar to the Proposed Project, this alternative would have a beneficial impact on biotic resources.

#### **4.3.2.E Noise**

The amount of grading and construction associated with this alternative could be more than with the Proposed Project. However, maximum noise level impacts from this alternative would be similar to the Proposed Project. Therefore, the types, duration, and levels of noise experienced both within the Project site and the immediate vicinity would be similar to the Proposed Project and would likewise be significant.

This alternative would allow more office, retail and hotel uses and less residential and open space than is proposed as part of the Proposed Project. The types and number of noise sources within the development area would be similar to the Proposed Project and, consequently, are not considered significant with compliance with the provisions of the City's Noise Ordinance. The number of daily trips generated by this alternative would be 60 percent greater than the Proposed Project. This increase would not be capable of increasing roadway noise level

impacts of the Project to significant levels. However, this alternative would contribute a greater percentage of traffic noise to the cumulative noise impacts on local roadways and intersections.

#### **4.3.2.F Light and Glare**

##### **4.3.2.F.(1) Natural Light – Shading**

The taller buildings allowed under this alternative could cause greater shading than what would occur with the Proposed Project. Development under this alternative could occur in structures up to 240 feet above finished grade, with building on 10 percent of the Project site limited only by flight regulations, that could shade residential areas north of the Proposed Project along Jefferson Boulevard. Shadow impacts of this alternative adjacent to sensitive receptors could be greater than those of the Proposed Project. Based on the Draft Los Angeles CEQA Thresholds Guide, the significance level for shading of off-site sensitive uses is shading for more than three hours between 9:00 A.M. and 3:00 P.M. from October to early April and shading for more than four hours between 9:00 A.M. and 5:00 P.M. from early April to late October. Furthermore, per the Area D Specific Plan, a significant level of shading would occur if development causes any shadows to fall on existing residential development surrounding the Project site during the hours of 9:00 A.M. to 3:00 P.M. during the spring equinox. This alternative would likely cause greater shading impacts than the Proposed Project and, depending on the placement of taller buildings, could result in significant impacts.

##### **4.3.2.F.(2) Artificial Light and Glare**

Lighting impacts would be more noticeable with the alternative than with the Proposed Project. Night lighting on taller buildings, should they occur, would be more apparent, as would lighting associated with the more commercially oriented development. However, lighting would be controlled in a manner similar to that of the Proposed Project, and would not be significant.

#### **4.3.2.G Land Use**

This alternative would have about 905 percent more office space, 310 percent more retail space, with a 50 percent decrease in community-serving uses compared to the Proposed Project. In this alternative there would be no housing as compared to the Project's 2,600 housing units. Proposed riparian corridor and bluff face restoration would be similar to that of the Proposed Project's Habitat Creation/Restoration component. This alternative would contain no active recreation (park) space in contrast to the 10.2 acres included in the Proposed Project.

Under this alternative there would be no need for plan amendments or revisions regarding the amount of proposed development. However, District and Specific Plan amendments would

be required for rezoning the land that lies within the Proposed Project site, since the commercial uses would not be allowed within the existing R4 zones. The rezoning would alter the location of the various types of development within the Specific Plan area. It would not notably alter the intent of the goals and policies within the Plan. This alternative would preclude implementation of the Proposed Project amendments which lessen potential impacts: for example, changes to a more locally, residentially oriented community with reduced height limits, and greater provision for parks and open space.

#### **4.3.2.H Mineral Resources**

Potential mineral resource impacts would be similar to those of the Proposed Project, which were found not to be significant. The site is not in a Mineral Resource Zone area. There are no mineral resources in the area of the Proposed Project .

#### **4.3.2.I Safety/Risk of Upset**

**Hazardous Materials Management.** Potential safety and risk of upset impacts associated with construction, excavation near or within areas that may contain potential hazardous materials from previous land uses or on-site buildings (including lead- and asbestos-containing materials). Asbestos abatement during demolition must be performed in accordance with federal, state and local regulations, reducing the risk to levels deemed acceptable by the regulatory agencies responsible for protecting the health of the public. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

Construction dewatering may be required during project development. Dewatering discharge would be conducted in accordance with RWQCB requirements; therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Soil/Groundwater Contamination.** Within the area of the Proposed Project, much of the overall planning area was formerly occupied by industrial uses, particularly related to aircraft manufacturing, testing and repair (i.e., activities associated with the “Plant Site”). The vast majority of such uses occurred within the adjacent Playa Vista First Phase Project east of the Proposed Project. Soil and groundwater contamination from past Plant Site activities was subsequently found in several areas, including some areas within the area of the Proposed Project. One area of known soil contamination, former Temporary Drum Storage Area, has been remediated to the satisfaction of regulatory agencies and other areas are being, or will be, evaluated for remediation in conjunction with RWQCB’s Cleanup and Abatement Order No. 98-125. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Soil Gas.** Potential safety and risk of upset impacts associated with methane-related hazards would be similar to those of the Proposed Project, which were found to be potentially significant; however, implementation of Project Design Features and other mitigation measures would reduce the impacts to a level that is less than significant. The results of the soil gas surveys completed in 1998 through 2001 found elevated levels of methane within shallow soils of the Proposed Project site. Such areas with elevated levels of methane are generally located in the southwest portion of the Proposed Project site (maximum concentration of 323,600 ppmv), although elevated levels of methane, ranging from approximately 13,000 ppmv to 44,400 ppmv, were detected in three other areas within the Proposed Project site. Only very low, if any, concentrations of hydrogen sulfide, benzene toluene, ethylbenzene, and xylenes (BTEX) were detected within the area of the Proposed Project. The majority of samples were “non-detect” for hydrogen sulfide based on a detection limit of one part per billion and no BTEX based on detection limits of 0.07 ppmv. The maximum concentration detected for hydrogen sulfide and constituents of BTEX were 1.000 ppmv and 1.1 parts per million, respectively. These very low concentrations do not pose a significant health and safety risk. A comprehensive worker safety program specific to the potential for soil gases being encountered during grading and construction is proposed as a Project Design Feature. With regard to methane-related safety/risk of upset impacts associated with long-term operation of the Proposed Project or alternative, the application of a comprehensive safety management program as a Project Design Feature would serve to avoid significant impacts. The mitigation program would avoid significant health and safety impact related to soil gas. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Aviation Hazards.** Potential safety/risk of upset impacts associated with aviation hazards would be similar to those of the Proposed Project, which were concluded to be less than significant. Operation of the two heliports currently permitted within the adjacent Playa Vista First Phase Project site could pose potential safety/risk of upset impacts on future development within the Proposed Project site. The heliport currently permitted within the Proposed Project site will not be developed. Heliport No. 1, located to the east of the Proposed Project site, poses a negligible risk, as its western flight path passes the Proposed Project site to the northeast and never crosses the site. Heliport No. 2, however, located just to the east of the easternmost lot of the Proposed Project site, may, in conjunction with the proposed building height districts for the development at the eastern end of the Proposed Project site, pose a potential safety/risk of upset impact related to aviation safety. No significant impacts are anticipated to occur because, should the height of a new building in the Proposed Project site extend into the subject air space and result in a conflict with operation of the heliport, the heliport is required to modify its flight path to eliminate the conflict or cease operations. Elimination or avoidance of such a conflict could be achieved if the heliport is relocated to a new suitable site or if the heliport is operated from the rooftop of a building.

### **4.3.2.J Population, Housing and Employment**

Under this alternative, the Proposed Project site would be developed to the maximum permitted limits under the existing Area D Specific Plan. Development per this plan would include increases in employee generating uses, including hotels, office space and retail space; it would include no housing units for the residential population. The population, housing and employment generated by these uses are shown in Table 196 on page 1311. This alternative would include 9,252 employees, 8,072 more than the Proposed Project, and contain no residents. There would be an excess of jobs with no housing to balance the existing work force in the area, an adverse effect, compared to the Proposed Project's beneficial impact on jobs/housing balance. However, while this balance is not favorable, the number of jobs provided would fall within the growth range anticipated for the sub-region, local area and region in the Growth Management Plan, and impacts would be less than significant.

### **4.3.2.K Transportation**

#### **4.3.2.K.(1) Traffic and Circulation**

This alternative generates an estimated 38,696 daily trip ends as opposed to 24,220 daily trip ends generated by the Proposed Project, thereby resulting in 60 percent more daily trips ends. During the morning peak hour, this alternative generates 2,882 A.M. peak hour trips as opposed to 1,626 A.M. peak hour trips generated by the Proposed Project. In the evening, this alternative generates 4,656 P.M. peak hour trips, and the Proposed Project generates 2,302 P.M. peak hour trips. This represents increases of 77 percent and 102 percent for the morning and evening peak hours, respectively. Trip generation gives a general indication of impacts on CMP intersections, freeway links, and public transit. Therefore, generally speaking, proportionate increases would occur in each of these impact areas.

In order to provide a more detailed evaluation regarding traffic and circulation, an analysis of this alternative has been prepared to determine the number of trips generated and the impacts on roadway service levels at the 218 intersections analyzed in this EIR. This analysis is included in the Traffic Report, Technical Appendix K of this EIR. This analysis and its following summary are based on impacts prior to mitigation. Per this analysis, this alternative produces significant traffic impacts at approximately 28 percent and 40 percent of the analysis locations in the A.M. and P.M. peak hours, respectively, compared to 14 percent and 22 percent of the locations impacted by the Proposed Project in terms of level of service during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a greater degree than the Proposed Project.

Table 196

## ALTERNATIVE 3: POPULATION, HOUSING AND EMPLOYMENT

## Housing and Population

	Dwelling Units	Average Household Size	Population
Alternative 3	0	N/A	0
Proposed Project	2,600	2.20	5,720
<b>+/- Compared to the Proposed Project</b>	<b>-100%</b>		<b>-100%</b>

## Employees

	Office – Commercial Employment								Total Employment
	Office <sup>a</sup>		Retail <sup>b</sup>		Hotel <sup>c</sup>		Community-Serving <sup>d</sup>		
	Quantity (NSF)	Employment	Quantity (NSF)	Employment	Quantity (Rms)	Employment	Quantity (NSF)	Employment	
Alternative 3	1,758,050	7,172	615,000	1,640	600	540	20,000	40	9,252
Proposed Project	175,000	700	150,000	400	0	0	40,000	80	1,180
<b>+/- Compared to the Proposed Project</b>									<b>+684%</b>

<sup>a</sup> Calculated by using a factor of 250 sq.ft. per employee.

<sup>b</sup> Calculated by using a factor of 375 sq.ft. per employee.

<sup>c</sup> Calculated by using a factor of 0.9 employees per room.

<sup>d</sup> Calculated by using a factor of 500 sq.ft. per employee.

Source: PCR Services Corporation.

Analysis of the transportation system operating conditions in the future with the Project alternative reveals the following system performance characteristics in relation to those with the Proposed Project:

- The average volume to capacity (V/C) ratio (or demand to capacity ratio) of the system would increase to 0.849 and 0.894 during the A.M. and P.M. peak hours, respectively, compared to the average V/C ratio of 0.842 and 0.880 respectively, during the same peak hours for the Proposed Project.
- Approximately 97 and 113 of the 218 analyzed intersection locations are projected to operate at unacceptable levels of service (LOS E or F) during A.M. and P.M. peak hours, respectively, compared to 90 and 108 locations operating at unacceptable LOS E or F with the Proposed Project.
- The above two operating conditions, however, should be viewed in light of the fact that the 2010 base conditions analysis reveals that the average system V/C ratio

without the Project is projected to be 0.833 and 0.867 during the A.M. and P.M. peak hours, respectively. Further, the number of intersection locations in 2010 base conditions that are projected to be operating at an unacceptable LOS E or F would be 84 and 104 during the A.M. and P.M. peak hours, respectively. Therefore, relative to 2010 base conditions, this alternative results in 13 and 9 more LOS E or F locations during the A.M. and P.M. peak hours, respectively, as opposed to 6 and 4 more LOS E or F intersections with the Proposed Project during the same peak hours.

As with the Proposed Project, this alternative would include a mitigation program to reduce potentially significant impacts. However, the additional trip generation associated with this alternative would make mitigation more difficult to reduce impacts to the same level as the Proposed Project.

#### **4.3.2.K.(2) Parking**

As with the Proposed Project, the parking needs for this alternative would be met through application of the standards and review procedures established in the Area D Specific Plan, and no significant parking impacts would arise. This alternative would, like the Proposed Project, likely result in the need for restricted parking along Centinela Avenue as would the Proposed Project due to off-site mitigation measures.

#### **4.3.2.K.(3) Bicycle Plan**

The improvements to the bikeway system included in the Proposed Project are not required in the Area D Specific Plan. The integrated bikeway system of the Proposed Project enhances the system anticipated in the existing plans, and would be of greater benefit. This alternative would not have an adverse effect on bikeways, and impacts would be less than significant.

#### **4.3.2.L Public Services**

##### **4.3.2.L.(1) Fire Protection**

The Proposed Project site would be serviced either through the current facilities and/or construction of the new station on a dedicated site within the adjacent Playa Vista First Phase Project. Emergency access would be provided by the same off-site roadways and project design features as those of the Proposed Project. This alternative would generate 9,252 employees. Based on the current service level of 56 emergency incidents per 1,000 residents and employees, approximately 490 emergency incidents would occur. This is 124 emergency incidents more than the 366 emergency incidents that occur with the Proposed Project. Therefore, the impacts

on fire protection services would be more than under the Proposed Project. Potential revenues to pay for services would also be increased.

#### **4.3.2.L.(2) Police Protection**

The Proposed Project site would be served through the same facilities as the Proposed Project. The population in this area would include no residents and 9,252 employees. In order to maintain the LAPD Pacific Area current service level of 1.17 police officers per 1,000 residents and employees, approximately 10 police officers with associated equipment would be required to provide police protection and to maintain the existing service level. This is 2 officers more than the 8 officers required by the Proposed Project. Therefore, the impacts on police protection services would be greater than under the Proposed Project, and significant impacts would occur with this alternative, as with the Proposed Project. Potential revenues to pay for services would also be increased.

#### **4.3.2.L.(3) Schools**

The alternative would generate a total of 463 public school students distributed as follows: 241 elementary students, 111 junior high school students and 111 high school students.<sup>607</sup> These amounts are less than those associated with the Proposed Project by 63, 34 and 56 students, respectively.

There is insufficient capacity to accommodate the students generated by this alternative at Playa del Rey Elementary School alone without the availability of the Playa Vista Elementary School. With the availability of the Playa Vista School there would be sufficient capacity. Although insufficient capacity exists to accommodate all elementary school students generated by this alternative prior to the provision of new classrooms, as is the case with the Proposed Project, payment of fees to the school district would fully mitigate this impact (pursuant to California Government Code Section 65995(h) (SB 50)).

The 111 junior high school students generated by this alternative could be accommodated within the junior high school which serves the Project site, Marina del Rey Middle School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Marina del Rey Middle School.

<sup>607</sup> *The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project. See Table 142 on page 1011.*

<i>Housing:</i>		<i>Employment:</i>	
<i>Elementary</i>	<i>N/A</i>	<i>Elementary</i>	<i>0.026</i>
<i>Junior High</i>	<i>N/A</i>	<i>Junior High</i>	<i>0.012</i>
<i>High School</i>	<i>N/A</i>	<i>High School</i>	<i>0.012</i>



The 111 high school students generated by this alternative could be accommodated within the high school which serves the Project site, Venice High School. The high school students that would be generated by this alternative would not exceed the forecasted unused capacity at Venice High School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Venice High School.

#### **4.3.2.L.(4) Parks and Recreation**

There would be no new residential units proposed for development under Alternative 3, and no population increase in this alternative. This increase would create no demand for park and open space from the residential population. The introduction of 9,252 employees could create a secondary demand for park and open space. The introduction of new parks into the area would not occur, and the existing ratio of active recreation space in the area, 0.7 acre per 1,000 residents, would not be increased, as it would be with the Proposed Project.

#### **4.3.2.L.(5) Libraries**

The L.A. City Library District would provide service to the Project site. The alternative would generate no new residents within the service area. This is 5,720 fewer residents than the population generated by the Proposed Project. Therefore, the impacts on library services, which were less than significant with the Proposed Project, would be proportionately reduced and less than significant with the alternative.

#### **4.3.2.M Energy Consumption**

Development of the alternative would result in the daily consumption of an estimated 99.684 MWh of electricity and 256.031 kcf of natural gas as shown in Table 197 on page 1315. This would represent about 88.1 percent more electrical and 47.2 percent less natural gas consumption than the Proposed Project. Similar to the Proposed Project, utility providers serving the site are anticipated to have the capacity to provide the energy required by this alternative, resulting in a less-than-significant impact.

#### **4.3.2.N Utilities**

##### **4.3.2.N.(1) Water Consumption**

Average daily potable water consumption under this alternative would be about 0.432 million gallons per day (mgd) as shown in Table 198 on page 1315 as compared to 0.503 mgd for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 3 would have greater water consumption from office,

Table 197

## ALTERNATIVE 3: ESTIMATED DAILY ENERGY CONSUMPTION

Demand Source	Quantity (Units)	Electricity		Natural Gas	
		Factor <sup>a</sup>	Consumption (MWh)	Factor <sup>b</sup>	Consumption (kcf)
Office	1,758.05 ksf	12.95 kWh/sf/year	62.375	2000.0 cf/ksf/month	115.598
Retail	615.0 ksf	13.55 kWh/sf/year	22.831	2900.0 cf/ksf/month	58.636
Community	20.0 ksf	10.50 kWh/sf/year	0.575	2000.0 cf/ksf/month	1.315
Hotel	600 rooms	8458.0 kWh/room/year	13.904	4080.0 cf/ksf/month	80.482
<b>Total Alternative 3</b>			<b>99.684</b>		<b>256.031</b>
<b>Total Proposed Project</b>			<b>53.007</b>		<b>484.728</b>
<b>% +/- Compared to the Proposed Project</b>			<b>88.1%</b>		<b>-47.2%</b>

ksf = thousand square feet    d.u. = dwelling unit    kWh = kilowatt-hour    MWh = Megawatt-hour  
kcf = thousand cubic feet    sf = square feet    cf = cubic feet

<sup>a</sup> Electricity consumption factors based on Table A9-11-A of SCAQMD *CEQA Air Quality Handbook* (April 1993). Daily consumption was calculated using the annual factor divided by 365 days.

<sup>b</sup> Natural Gas consumption factors based on Table A9-12-A of SCAQMD *CEQA Air Quality Handbook* (April 1993) for monthly gas consumption. Daily consumption was calculated using monthly consumption factor multiplied by 12 and divided by 365 (~ 30.41 days/month).

Source: Camp Dresser & McKee, Inc., 2003.

Table 198

## ALTERNATIVE 3: ESTIMATED DAILY POTABLE WATER CONSUMPTION

Demand Source	Quantity (Units)	Factor <sup>a</sup>	Consumption (mgd)
Office	1,758.05 ksf	0.000165 mgd/ksf	0.290
Retail	615.00 ksf	0.000088 mgd/ksf	0.054
Community	20.00 ksf	0.000088 mgd/ksf	0.002
Hotel	600 rooms	0.000143 mgd/room	0.086
<b>Total Alternative 3</b>			<b>0.432</b>
<b>Total Proposed Project</b>			<b>0.503</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-14.1%</b>

ksf = thousand square feet    d.u. = dwelling unit    mgd = million gallons per day

<sup>a</sup> Water consumption factors from City of L.A. *Draft Citywide CEQA Thresholds Guide*, wastewater generation factors. Wastewater generation factors are comparable to those for water consumption (90 percent of those for water for all factors), with the exception of office uses.

Source: Camp Dresser & McKee, Inc., 2003.

retail, and hotel uses and comparatively less from residential and community-serving uses. Overall, Alternative 3 would generate 14.1 percent less potable water demand than the Proposed Project and, therefore, would have a smaller adverse impact. In regards to reclaimed water, as summarized in Table 199 on page 1317, demand associated with office uses (cooling towers and toilets) and landscaping irrigation, this alternative would consume 0.093 mgd of reclaimed water as compared to 0.051 mgd associated with the Proposed Project. This represents an increase of 82.4 percent over the Proposed Project, which is attributable almost exclusively to the dramatic increase in office uses under this alternative. As with the Proposed Project, this alternative would have a less-than-significant impact on water consumption.

#### **4.3.2.N.(2) Wastewater**

Wastewater generation under this alternative would be about 0.486 mgd as shown in Table 200 on page 1317 as compared to 0.467 mgd for the Proposed Project. Based on the comparative difference in the nature and amount of land uses proposed, Alternative 3 would have greater wastewater generation from office, retail, and hotel uses, and comparatively less from residential and community-serving uses. Overall, Alternative 3 would generate 4.1 percent more wastewater than the Proposed Project. As with the Proposed Project, this alternative would have a less-than-significant impact on wastewater generation.

#### **4.3.2.N.(3) Solid Waste**

Solid waste generation under this alternative would be about 16.264 tons per day (tpd) as shown in Table 201 on page 1318 as compared to 18.917 tpd net for the Proposed Project. Based on the comparative difference in the nature and amount of land uses proposed, Alternative 3 would have greater solid waste generation from office, retail, and hotel uses and comparatively less from residential and community-serving uses. Overall, implementation of Alternative 3 would have 14.0 percent less solid waste generation compared to the Proposed Project. Nonetheless, as with the Proposed Project, impacts would be significant.

#### **4.3.2.O Visual Qualities (Aesthetics and Views)**

**Aesthetics.** The emphasis on office and commercial development in this alternative, with less restrictive height limits, could translate into taller buildings and a more urban development appearance. This contrasts with the more neighborhood-like character of the Proposed Project. The alternative could include less open space on the Project site. Adverse impacts could be greater than with the Proposed Project. As with the Proposed Project, the loss of undeveloped area and related visual relief from the urban setting would be considered a significant impact on aesthetics.

Table 199

**ALTERNATIVE 3: ESTIMATED DAILY RECLAIMED WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor</b>	<b>Consumption (mgd)</b>
Office Cooling Towers	1,758.05 ksf	32 gpd/ksf <sup>a</sup>	0.056
Office Toilets	1,758.05 ksf	21 gpd/ksf <sup>a</sup>	0.037
Landscaping	0 acres	3,650 gpd/acre <sup>b</sup>	0.000
<b>Total Alternative 3</b>			<b>0.093</b>
<b>Total Proposed Project</b>			<b>0.051</b>
<b>% +/- Compared to the Proposed Project</b>			<b>82.4%</b>

*ksf = thousand square feet gpd = gallons per day mgd = million gallons per day*

<sup>a</sup> Reclaimed water consumption factors from City of LA Draft Citywide CEQA Thresholds Guide, based on 4 employees per 1000 square feet of office space.

<sup>b</sup> Landscape irrigation demand factor from Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities", June 1990, updated June 1992.

Source: Camp Dresser & McKee, Inc., 2003

Table 200

**ALTERNATIVE 3: ESTIMATED DAILY WASTEWATER GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor<sup>a</sup></b>	<b>Generation (mgd)</b>
Office	1,758.05 ksf	0.000203 mgd/ksf	0.357
Retail	615.00 ksf	0.00008 mgd/ksf	0.049
Community	20.00 ksf	0.00008 mgd/ksf	0.002
Hotel	600 rooms	0.000130 mgd/room	0.078
<b>Total Alternative 3</b>			<b>0.486</b>
<b>Total Proposed Project</b>			<b>0.467</b>
<b>% +/- Compared to the Proposed Project</b>			<b>4.1%</b>

*ksf = thousand square feet d.u. = dwelling unit mgd = million gallons per day*

<sup>a</sup> Wastewater generation factors from City of L.A. Draft Citywide CEQA Technical Guide. Wastewater generation factors are equal to 90 percent of potable water consumption factors, to account for surface infiltration and evaporation losses. Wastewater generation factors are comparable to those for water consumption (90 percent of those for water for all factors), with the exception of office uses, where wastewater is used for cooling towers and toilets, yielding a factor of 203 gpd/ksf.

Source: Camp Dresser & McKee, Inc., 2003.

Table 201

**ALTERNATIVE 3: ESTIMATED DAILY SOLID WASTE GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor<sup>a</sup></b>	<b>Generation (tpd)<sup>b</sup></b>
Office	1,758.05 ksf	0.003 tpd/ksf	5.274
Retail	615.00 ksf	0.0156 tpd/ksf	9.594
Community	20.00 ksf	0.0035 tpd/ksf	0.070
Hotel	600 rooms	0.00221 tpd/rooms	1.326
<b>Total Alternative 3</b>			<b>16.264</b>
<b>Total Proposed Project</b>			<b>18.917</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-14.0%</b>

*ksf = thousand square feet d.u. = dwelling unit tpd = tons per day*

<sup>a</sup> *Solid waste generation factors based on the California Integrated Waste Management Board website, Waste Characterization database: [www.ciwmb.ca.gov/WasteChar/WasteGenRates](http://www.ciwmb.ca.gov/WasteChar/WasteGenRates), November, 2001.*

<sup>b</sup> *Solid waste generation presented in this table is prior to waste diversion, which would substantially reduce the amount of this waste requiring landfill disposal.*

*Source: Camp Dresser & McKee, Inc., 2003.*

**Views.** Greater view impacts could result from the taller buildings which would be allowed. Unlike the Proposed Project, these buildings could exceed, by 100 feet or more, the average height of the bluffs, thereby obstructing potential view corridors. This alternative could have greater impacts on visual qualities than the Proposed Project, and could exacerbate rather than lessen significant visual impacts.

#### **4.3.2.P Cultural Resources**

##### **4.3.2.P.(1) Paleontological Resources**

Construction-related activities, such as grading and excavation, could result in direct impacts on paleontological resources by covering or destroying fossiliferous rock units or exposing fossil bearing rock units to unauthorized collecting. At the same time, discovery of artifacts could occur with mitigation that would not otherwise occur. The amount of ground cover with this alternative could be slightly greater than that of the Proposed Project. Impacts would be roughly similar to the Proposed Project.

##### **4.3.2.P.(2) Archaeological Resources**

Construction related activities could disturb, destroy, or remove archaeological sites or artifacts and expose such resources to theft and vandalism. At the same time, collection, study and archiving of such artifacts could result from mitigation measures that would be implemented

with a development program. The amount of ground cover with this alternative could be slightly greater than that of the Proposed Project. Impacts would be roughly similar to the Proposed Project.

#### **4.3.2.P.(3) Historical Resources**

As with the Proposed Project, the existing structures located on the southern portion of the site would be demolished. However, these structures are not considered historical resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

### **4.3.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative net impacts between this alternative and the Proposed Project is shown in Table 202 on pages 1320 through 1323. The alternative would increase the degree of significant air quality and traffic adverse impacts, as well as significant impacts associated with the obstruction of views, over that which would result from development of the Proposed Project. The alternative would also increase the Project's adverse, but non-significant impacts on grading, groundwater hydrology, surface water quality, electricity consumption, reclaimed water consumption, and wastewater generation. These impacts would still be less than significant. Beneficial impacts of the Proposed Project that would be diminished or that would not be realized include impacts to housing, jobs/housing balance, flood control, and bikeway improvements. It would reduce the Project's non-significant impact on schools, libraries, energy and water consumption, and plant and animals from indirect sources. Overall, development of this alternative would produce a greater degree of environmental impacts than the Proposed Project.

### **4.3.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

Without a housing component, this alternative would not meet the Project objectives of providing a mixed-use community promoting mutually supportive uses such as employment, housing and recreation. The lack of housing along with the greater amount of commercial activity and off-site orientation would result in a less internally oriented community, exacerbating jobs/housing imbalance. This would work against the intended decrease in dependency on the automobile with resultant traffic, air quality and noise benefits. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and City's need for housing Citywide and in the Westside, in particular. The Applicant's resource protection, enhancement and conservation goal could be met with this alternative.

Table 202

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 3 (AREA D SPECIFIC PLAN)  
TO THE PROPOSED PROJECT \***

<b>Issue Area</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Beneficial	Beneficial	Worse	Stabilization of bluffs would be completed, but deeper foundations for taller buildings may require more extensive grading/excavation.
Dewatering/Subsidence	No Impact	No Impact	Similar	Dewatering would be necessary for excavation of subterranean parking structures and for operation of methane safety systems, though no net subsidence is anticipated.
Seismic Hazards	Non-Significant	Non-Significant	Similar	People and structures subjected to level of seismic risk, though more employees would be located on-site during work hours. However, construction would conform to same building and seismic safety codes, thus making risks mitigable.
Slope Stability	Non-Significant	Non-Significant	Similar	Stabilization of Bluff and development at similar distance from base of bluffs.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Similar	Generally similar with precise impacts dependent on design.
Construction/Local Emissions	Non-Significant	Non-Significant	Similar	Generally similar with precise impacts dependent on design.
Operations/Regional Emissions	Significant	Significant	Worse	Increased mobile and stationary sources generate additional emissions.
Operations/Local Emissions	Non-significant	Non-significant	Worse	Increased traffic (60 percent increase) generates additional emissions.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Improvements to storm drainage.
Groundwater	Non-Significant	Non-Significant	Worse	Increase in impervious surfaces.

Table 202 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 3 (AREA D SPECIFIC PLAN)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Worse	Increase in impervious surfaces and greater potential for increase polluted runoff. Implementation of SWPPP & BMPS for both.
Groundwater	Non-Significant	Non-Significant	Similar	Although more impervious surface area from lack of park/open space, generally similar and subject to the same regulations.
<b>Biotic Resources</b>				
Plant Life	Beneficial	Beneficial	Better	Less residential development would lead to reductions in indirect impact to plant life associated with increased human presence and use of natural areas by domestic animals, as well as the increased use of non-native plants peripheral to natural areas.
Animal Life	Beneficial	Beneficial	Better	Less residential development would lead to reductions in indirect impact to animal life associated with human presence.
<b>Noise</b>				
Construction	Significant	Significant	Similar	Similar grading and construction. Maximum noise levels would be similar to the Proposed Project.
Stationary	Non-Significant	Non-Significant	Similar	Types and number of noise sources would be similar to the Proposed Project.
Mobile	Non-Significant	Non-Significant	Similar	Average daily trips would increase by 60 percent, but increase would be imperceptible.
<b>Light and Glare</b>				
Natural Light – Shading	Significant	Non-Significant	Worse	Greater shading. Potential significant impacts on off-site sensitive uses.
Artificial Light and Glare	Non-Significant	Non-Significant	Worse	Taller, more commercially oriented buildings.
<b>Land Use</b>				
Regulatory	Non-Significant	Non-Significant	Similar	Would require plan amendments/rezoning.
Land Use Pattern	Non-Significant	Non-Significant	Worse	Contains a use mix which is less balanced and less locally oriented.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Similar	No mineral resources are present on site.



Table 202 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 3 (AREA D SPECIFIC PLAN)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Similar	Higher maximum building heights, but less residential population exposed to potential seismic hazards.
<b>Population, Housing and Employment</b>				
Population	Non-Significant	Non-Significant	Worse	100 percent less population on-site than the Proposed Project, but population and housing growth would occur elsewhere.
Housing	Non-Significant	Beneficial	Worse	100 percent less housing than the Proposed Project.
Employment	Beneficial	Beneficial	Better	684 percent more employment than the Proposed Project.
Jobs/House Bal.	Significant	Beneficial	Worse	No housing contribution to the jobs rich subregion. The .45 jobs/housing ratio for the Proposed Project moves the subregion towards less imbalance.
<b>Transportation</b>				
Traffic and Circulation	Significant	Significant	Worse	60 percent more daily trips, with proportionate increases likely to occur on CMP intersections, freeway links, and public transit.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated.
Bicycle Plan	No Impact	Beneficial	Worse	Less extensive improvements to bikeways.
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Similar	Greater demand with increased revenue.
Police Protection	Significant	Significant	Similar	Greater demand with increased revenue.
Schools	Non-Significant	Non-Significant	Better	Less residential development would result in less demand on schools.
Parks and Recreation	Non-Significant	Non-Significant	Better/Worse	Less parks and open space/no demand for parks and open space.
Libraries	Non-Significant	Non-Significant	Better	Less residential development would result in less demand on libraries.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Worse	88.1 percent more electricity and 47.2 percent less natural gas demand.

Table 202 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 3 (AREA D SPECIFIC PLAN)  
TO THE PROPOSED PROJECT**

<b>Issue Area</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Better	14.1 percent less daily potable water consumption and 82.4 percent more daily reclaimed water consumption.
Wastewater	Non-Significant	Non-Significant	Worse	4.1 percent more daily wastewater generation.
Solid Waste	Significant	Significant	Better	14.0 percent less daily solid waste generation. Nonetheless, any exacerbation in demand is considered significant
<b>Visual Qualities (Aesthetics and Views)</b>				
Aesthetics	Significant	Significant	Worse	Less open space and taller buildings.
Views	Significant	Significant	Worse	Taller buildings and more buildings in view corridors.
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Similar	Roughly similar areas disturbed, with similar research mitigation.
Archaeological Resources	Non-Significant	Non-Significant	Similar	Roughly similar areas disturbed, with similar research mitigation.
Historical Resources	No Impact	No Impact	Similar	In either case, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

Source: PCR Services Corporation, 2003.

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## **4.4 ALTERNATIVE 4: REDUCED INTENSITY – 25% REDUCTION**

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### **4.4.1 INTRODUCTION**

This section presents an environmental analysis of an alternative development aimed at reducing the potential Project impacts by lessening the amount of development which would occur in each of the various land use categories by 25 percent. Table 203 on page 1325 compares this alternative with the Proposed Project for each of the major land uses and related project components.

Under such an alternative, the resulting massing of buildings could take several forms. For the purposes of this analysis, it is assumed that all buildings would be reduced in height by approximately 25 percent, thus reflecting a lower but still varied range of building heights placed within approximately the same network of streets and open spaces proposed for the Proposed Project. It is assumed that development within the various use categories would occupy roughly the same area of the Project site as the Proposed Project, only with the reduced intensity. The reduced park area would be used for development with a slight decrease in net densities on the remaining lots. It is assumed that this alternative would include implementation of the riparian corridor and the bluff face restoration, similar to that of the Proposed Project.

For each environmental issue area, a comparative determination is made as to whether the overall mitigated adverse environmental impacts of this alternative would be better, similar, or worse than the corresponding Proposed Project impacts. A summary of comparative adverse impacts is presented at the end of the analysis for this Alternative in Table 210 on pages 1344 through 1347. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.

### **4.4.2 ANALYSIS**

#### **4.4.2.A Earth**

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

Table 203

**COMPARISON OF ALTERNATIVE 4 COMPONENTS:  
REDUCED PROJECT TO THE PROPOSED PROJECT**

<b>Project Component</b>	<b>Unit</b>	<b>Alternative Project</b>	<b>Proposed Project</b>	<b>Numerical Difference</b>	<b>Percent Change</b>
Office	NSF	131,250	175,000	-43,750	-25%
Retail	NSF	112,500	150,000	-37,500	-25%
Community-Serving	GSF	30,000	40,000	-10,000	-25%
Total Housing	Units	1,950	2,600	-650	-25%
Active Open Space (Parks)	Acres	9.6	12.7	-2.8	-23%

*NSF – net square feet      GSF – gross square feet*

<sup>a</sup> *Park space would be reduced 25 percent to 8.6 acre, and 1.0 acre of bicycle lanes could still be provided.*

*Source: PCR Services Corporation, 2002.*

**Grading.** Under this alternative, the areas developed would be similar to those of the Proposed Project, but less grading may be required for buildings with lower heights and less requirements for subterranean parking. This alternative would still include stabilization of the bluffs as necessary, similar to the Proposed Project, and the net slope stability impact of this alternative would be comparable to that of the Proposed Project. Overall, development of this alternative would result in less significant grading impacts than those of the Proposed Project.

**Dewatering/Subsidence.** Because of the shallow groundwater level conditions which exist throughout the Playa Vista Project site, dewatering is likely to be required in certain areas requiring subsurface excavation, although this is dependent upon the actual construction techniques employed. Any dewatering which becomes necessary for development construction or for excavation would be done in accordance with dewatering permits issued by the Regional Water Quality Control Board (RWQCB). Prior to initiating any construction dewatering activities that are not included within the scope of the current Permit provisions, the Applicant/Contractor would be required to update the plans and provisions related to the Permit and notify the State Water Resources Control Board (SWRCB) of any such plan/provisions modifications. Ongoing, or permanent, dewatering that may occur as part of this Alternative, such as relates to ongoing groundwater remediation activities and dewatering of sumps in subterranean structures (e.g., for subterranean parking and for methane safety systems), is not anticipated to be substantial relative to construction dewatering. Furthermore, Group Delta Consultants, Inc. concluded that operation of dewatering systems for subterranean parking and the methane safety systems would not result in any net subsidence at the Proposed Project site. As such, similar to the Proposed Project, dewatering activities from construction activities and from operation of proposed uses under this alternative are not anticipated to result in any net subsidence at the Proposed Project site, and a less-than-significant impact is anticipated.

**Seismic Hazards.** Groundshaking and fault rupture hazards would be the same as for other locations throughout the Los Angeles area, though the site is not located on, or in close proximity to active earthquake faults, as is the case with the Proposed Project. Although this alternative would have a smaller population than the Proposed Project (i.e., comparatively fewer people exposed to seismic hazards), buildings and other improvements constructed under this alternative would be subject to the same building and seismic codes as in the Proposed Project, producing similar protection from seismic activity.

As pertains to tsunami and seiche hazards under Alternative 4, all minimum finished pad and street elevations would be above tsunami limits, as would those of the Proposed Project; hence, tsunamis are unlikely to significantly affect development within the site. No water bodies with the potential to present seiche hazards to the project site exist in close proximity; as such, no seiche hazard would occur.

In order to avoid possible liquefaction (i.e., settlement) resulting in structural damage, structures would be designed to resist these effects and/or the underlying soils would be properly prepared. In the application of City structural engineering standards, liquefaction must be considered during structural design. Therefore, with the provisions required by City building and safety requirements and by the Uniform Building Code, people occupying the facilities would be protected, and damage would be minimized. No significant adverse impact from liquefaction to future structural uses is indicated due to required compliance with existing prerequisites for building permit issuance.

Impacts from ground lurching (i.e., the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks) would only affect the bluffs along the southern edge of the Proposed Project site. However, due to the geology and overall stability of the bluffs, lurching of the bluff face is not anticipated to occur. Although ground lurching is not expected to occur, the potential for any such impacts would be less for this alternative than for the Proposed Project, as less development would result in reduced potential for persons or structures to be affected by such seismic hazards.

**Slope Stability.** Similar to the Proposed Project, the potential for slope instability, is only a potential hazard along the southerly boundaries adjacent to the bluffs. Also, the portions of the slopes below Cabora Road identified as having the potential for slope stability problems would be repaired in conjunction with construction of the Riparian Corridor. The stabilization of the slopes below Cabora Road would achieve an acceptable factor of safety. As with the Proposed Project, the Riparian Corridor would provide distance between the bluffs and the development; therefore, no significant adverse impacts are expected to occur.

#### 4.4.2.B Air Quality

The amount of site preparation under this alternative may not require as much excavating and grading activities and similar construction compared to the Proposed Project and construction activities would be proportionally reduced by approximately 25 percent. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease compared to the Proposed Project. The construction emissions generated with the alternative would be less than those of the Proposed Project over the construction period. However, impacts during maximum conditions, those used for measuring significance, would be similar to those of the Proposed Project and would be significant for regional construction emissions. Local emissions dispersions from fugitive dust emissions from grading would be similar to those of the Proposed Project, as the duration of the excavation and grading would be less but not the daily activity, and would not be significant.<sup>608</sup>

With the proposed reductions in several Project uses, the operational impacts associated with road traffic from this alternative would be reduced by approximately 22 percent, with a commensurate decrease in air emissions. Impacts from stationary uses would be reduced by 25 percent, however impacts from these uses comprise a very small portion of the overall operations emissions. The reductions would not be sufficient to avoid the significant impacts on CO, NO<sub>x</sub>, PM<sub>10</sub> and ROC associated with the Proposed Project. The reduction of 22 percent traffic trips associated with this alternative would contribute to a proportionate decrease in localized emissions of carbon monoxide. The maximum predicted carbon monoxide concentration for the Proposed Project combined with 2010 base traffic was 7.1 ppm or 21 percent below the 9.0 ppm significance threshold for localized carbon monoxide. The Proposed Project resulted in approximately 6 percent of the pollutant concentration or 0.4 ppm. Therefore, a decrease in daily trips generated by this alternative would decrease the increment from 0.4 ppm to 0.3 ppm and would be approximately 22 percent below the 9.0 ppm significance threshold for localized carbon monoxide.

#### 4.4.2.C Water Resources

##### 4.4.2.C.(1) Hydrology

**Surface Water.** Impacts related to surface water hydrology would be similar to those of the Proposed Project. Although there would be less intensive development occurring under this alternative than under the Proposed Project, it is anticipated that the amount of surface

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<sup>608</sup> All calculations used in this analysis are presented in Appendix E, Air Quality Technical Appendices, of this EIR.

disturbance and addition of impervious surface area would be the same for the alternative and the Proposed Project. As with the Proposed Project, it is anticipated that the storm drain system would be designed to accommodate a 50-year design storm, in accordance with City requirements. In addition, the same design features would be incorporated to accommodate the increased runoff and provide an appropriate level of on-site flood protection, detention, and drainage. Flood protection measures would include additions and improvements to the existing storm drain system and the provision of stormwater retention facilities (Freshwater Marsh and Riparian Corridor) within the adjacent Playa Vista First Phase and Proposed Project sites. Alternative 4 proposes a reduction in development, but it would occur within roughly the same locations as the Proposed Project. As such, there would not be a substantial change in impervious surface area and the design and construction of adequate flood control would be roughly the same as the Proposed Project. Therefore, as with the Proposed Project, no significant impacts related to flooding or flood control are anticipated from development under this alternative.

**Groundwater.** The increase in impervious surfaces compared to existing conditions poses the potential to reduce groundwater recharge. Since Alternative 4 proposes to decrease the intensity of development compared to the Proposed Project, the impacts related to groundwater hydrology would be comparatively similar. Construction-related dewatering for subsurface excavation would be temporary and is not expected to have any long-term effects. The need for permanent dewatering systems would be less under this alternative. As with the Proposed Project, no significant impacts to groundwater recharge and hydrology are expected to occur.

#### 4.4.2.C.(2) Water Quality

**Surface Water.** Similar to the Proposed Project, the surface water quality in the vicinity of the site under Alternative 4 could potentially be impacted both temporarily by construction activities and long-term by activities associated with the proposed land uses. The preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and appropriate best management practices (BMPs) during construction, would reduce the impacts to water quality to less than significant. Potential water quality impacts would be similar to the Proposed Project, and would not be significant.

**Groundwater.** Similar to the Proposed Project, groundwater quality is not expected to be significantly impacted by the development of Alternative 4. Groundwater resources could potentially be impacted by short-term construction activities and long-term changes in land use and recharge patterns. Short-term effects would be minimized due to the implementation of a SWPPP, the associated BMPs included in the plan, and compliance with NPDES requirements for dewatering. No long-term effects are anticipated because no industrial development is

planned for the Project; any uses that involve storage of fuel or other hazardous material would be regulated under local, state, and federal laws.

#### **4.4.2.D Biotic Resources**

A reduction in Project density would not significantly alter direct impacts associated with the implementation of the Proposed Project. As stated, the amount of developed uses would be reduced by 25 percent but the various use categories would occupy a roughly similar area as the Proposed Project. For purposes of this analysis, restoration of riparian and bluff habitat is assumed, as with the Proposed Project.

The reduction in land use intensity under this alternative would also incrementally reduce indirect impacts. Indirect impacts include increases in human use in adjacent natural areas, increased human and domestic animal presence, increases in the number of exotic and non-native plants species present in natural areas adjacent to urban development, and increases in light and glare in adjacent natural areas. Similar to the Proposed Project, this alternative would have a beneficial impact on biotic resources.

#### **4.4.2.E Noise**

Because the type of construction associated with this alternative would be similar to the Proposed Project, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the Proposed Project and are considered significant. However, there would be fewer days of construction activity associated with this alternative since it reduces the amount of developed uses by 25 percent.

A reduction in land use intensity would also result in a reduction in noise levels associated with operational on-site equipment and activity. The on-site equipment and activity noise levels associated with the Proposed Project are not considered significant and would be less so with this alternative. An expected reduction of 22 percent in traffic volumes associated with this alternative would yield a slight reduction in comparison to Proposed Project traffic noise.

#### **4.4.2.F Light and Glare**

##### **4.4.2.F.(1) Natural Light – Shading**

Total building massing would be reduced with this alternative and, thus, overall shading would be reduced. However, with height restrictions similar to those of the Proposed Project, the potential maximum shading impacts that would occur adjacent to sensitive off-site uses would be



similar to the Proposed Project. As was the case with the Proposed Project, off-site shading impacts would be less than significant; and on-site shading effects would constitute design features of the Project and would not necessarily be adverse or beneficial.

#### **4.4.2.F.(2) Artificial Light and Glare**

With reduced building massing, the overall amount of lighting would be slightly reduced. However, the overall lighting profile and appearance would be similar to the Proposed Project. Both the Proposed Project and this alternative would cause lighting to blend with the surrounding area in similar ways. In both cases, lighting and use of non-reflective materials could be controlled to limit effects on off-site uses.

#### **4.4.2.G Land Use**

The focus of this alternative is on a 25 percent across-the-board reduction in the amount of development which could occur for the major Proposed Project uses. Such a reduction would lessen the amount of developed area available to meet regional growth demands in a clustered, mixed-use configuration.

Under this alternative, the resulting land use patterns in the area would be essentially the same as those which would occur with the Proposed Project. As was the case with the Proposed Project, the land use designations shown in the existing District and Specific plans would need amendment. Habitat creation and restoration is assumed to be similar to that of the Proposed Project.

#### **4.4.2.H Mineral Resources**

Potential mineral resource impacts would be similar to those of the Proposed Project, which were found to be not significant. There are no mineral (including petroleum) resources in the area of the Proposed Project site.

#### **4.4.2.I Safety/Risk of Upset**

**Hazardous Materials Management.** Even though the amount of development would be 25 percent less with this alternative and the amount of grading would be less, the location of ground area disturbed would be similar. Safety hazards similar to those of the Proposed Project would be involved in the excavation and construction activities near areas with known hazardous materials and in demolition. Asbestos abatement during demolition must be performed in accordance with federal, state and local regulations, reducing the risk to levels deemed acceptable by the regulatory agencies responsible for protecting the health of the public.

Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

Construction dewatering may be required during project development. As with the Proposed Project, dewatering discharge would be conducted in accordance with RWQCB requirements; therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Soil/Groundwater Contamination.** Much of the Project site was formerly occupied by industrial uses, particularly related to aircraft manufacturing, testing and repair (i.e., activities associated with the “Plant Site”). The vast majority of such uses occurred within the adjacent Playa Vista First Phase Project site east of the Proposed Project. Soil and groundwater contamination from past Plant Site activities was subsequently found in several areas, including some areas within the area of the Proposed Project. One area of known soil contamination, the former Temporary Drum Storage Area, has been remediated to the satisfaction of regulatory agencies and other areas are being, or will be, evaluated for remediation in conjunction with RWQCB’s Cleanup and Abatement Order No. 98-125. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Soil Gas.** Potential safety and risk of upset impacts associated with methane-related hazards would be similar to those of the Proposed Project, which were found to be potentially significant; however, implementation of Project Design Features and other mitigation measures that would also apply to development under this alternative would reduce the impacts to a level that is less than significant. The results of the soil gas surveys completed in 1998 through 2001 found elevated levels of methane within shallow soils of the Proposed Project site. Such areas with elevated levels of methane are generally located in the southwest portion of the Proposed Project site (maximum concentration of 323,600 ppmv), although elevated levels of methane, ranging from approximately 13,000 ppmv to 44,400 ppmv, were detected in three other areas within the Project site. Only very low, if any, concentrations of hydrogen sulfide, benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected within the area of the Proposed Project. The majority of samples were “non-detect” for hydrogen sulfide based on a detection limit of one part per billion and no BTEX was detected based on detection limits of 0.07 parts per billion by volume (ppbv). The maximum concentration detected for hydrogen sulfide and constituents of BTEX were 1.000 ppmv and 1.1 parts per million, respectively. These very low concentrations do not pose a significant health and safety risk. A comprehensive worker safety program specific to the potential for soil gases being encountered during grading and construction is proposed as a Project Design Feature which is assumed to also apply to this alternative. With regard to methane-related safety/risk of upset impacts associated with long-term operation of the Proposed Project or this alternative, the application of a comprehensive methane management program as a Project Design Feature would serve to avoid significant impacts. The mitigation program would avoid significant health and safety impacts related to

soil gas. Therefore, with implementation of applicable mitigation measures, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Aviation Hazards.** Potential safety/risk of upset impacts associated with aviation hazards would be similar to those of the Proposed Project, which were concluded to be less than significant. Operation of the two heliports currently permitted within the adjacent Playa Vista First Phase Project site could pose potential safety/risk of upset impacts on future development within the Proposed Project site. The heliport currently permitted within the Project site, as is the case with the Proposed Project, will not be developed. Heliport No. 1, located to the east of the Project site, poses a negligible risk, as its western flight path passes the area of the Proposed Project to the northeast and never crosses the site. Heliport No. 2, however, located just to the east of the easternmost lot of the Proposed Project site, may, in conjunction with the proposed building height districts for the development at the eastern end of the Proposed Project site, pose a potential safety/risk of upset impact related to aviation safety. Nonetheless, no significant impacts are anticipated to occur because, should the height of a new building in the Proposed Project extend into the subject air space and result in a conflict with operation of the heliport, the heliport is required to modify its flight path to eliminate the conflict or cease operations. Elimination or avoidance of such a conflict could be achieved if the heliport is relocated to a new suitable site or if the heliport is operated from the rooftop of a building.

#### **4.4.2.J Population, Housing and Employment**

Under this alternative, office, retail, community-serving, and housing uses would be 25 percent less than under the Proposed Project. The resulting amounts of employment, housing, and population are presented in Table 204 on page 1333. This alternative would result in a population gain of 4,290, housed in 1,950 dwelling units. Total employment would be 885. Since the reductions from the amounts included in the Proposed Project are proportional, the job/housing ratio would be similar to the 0.45 ratio of the Proposed Project. Both increase the relative amount of housing in the jobs rich Local Area and sub-region, and both support a development concept with mixed, mutually supportive uses, however, the benefits are not as great with the alternative (the Proposed Project would reduce the jobs/housing ratio in the Local Area to 2.43, but the alternative would only lower it to 2.49). The number of jobs, houses and related population would fall within the growth range anticipated for the sub-region in the Growth Management Plan.

Table 204

**ALTERNATIVE 4: POPULATION, HOUSING AND EMPLOYMENT****Housing and Population**

	<b>Dwelling Units</b>	<b>Average Household Size</b>	<b>Population</b>
Alternative 4	1,950	2.2	4,290
Proposed Project	<b>2,600</b>	<b>2.2</b>	<b>5,720</b>
<b>+/- Compared to the Proposed Project</b>	<b>-</b>		<b>-25%</b>

**Employees**

	<b>Office – Commercial Employment</b>						<b>Total Employment</b>
	<b>Office<sup>a</sup></b>		<b>Retail<sup>b</sup></b>		<b>Community-Serving<sup>d</sup></b>		
	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	
Alternative 4	131,250	525	112,500	300	30,000	60	885
Proposed Project	175,000	700	150,000	400	40,000	80	<b>1,180</b>
<b>+/- Compared to the Proposed Project</b>							<b>-25%</b>

<sup>a</sup> Calculated by using a factor of 250 sq.ft. per employee.

<sup>b</sup> Calculated by using a factor of 375 sq.ft. per employee.

<sup>c</sup> Calculated by using a factor of 500 sq.ft. per employee.

Source: PCR Services Corporation.

**4.4.2.K Transportation****4.4.2.K.(1) Traffic and Circulation**

This alternative generates 18,785 daily trip ends, representing 22 percent fewer trips than the Proposed Project's 24,220 trips. During the morning and evening peak hours, this alternative generates 1,247 and 1,789 trips respectively. This contrasts with 1,626 trips and 2,302 trips for the Proposed Project for the respective peak hours. This represents 23 percent and 22 percent fewer trips than the Proposed Project in the morning and evening peak hours, respectively. Trip generation provides a general indication of impacts on CMP intersections, freeway links, and public transit. Therefore, generally speaking, proportionate decreases would occur in each of these impact areas.

In order to provide a more detailed evaluation regarding traffic and circulation, an analysis of this alternative has been prepared to determine the number of trips generated and the impacts on roadway service levels at the 218 intersections analyzed in this EIR. (See the Village at Playa Vista Traffic Report, Appendix K of this EIR.) This analysis and its following summary are based on impacts prior to mitigation. Per this analysis, the alternative produces significant

traffic impacts at approximately 10 percent and 17 percent of the analysis locations in the A.M. and P.M. peak hours, respectively, compared to 14 percent and 20 percent of the locations impacted by the Proposed Project during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a lesser degree than the Proposed Project. No significant differences in travel patterns outside the Project area would be expected between this alternative and the Proposed Project.

Analysis of the transportation system operating conditions in the future with the Project alternative reveals the following system performance characteristics in relation to those with the Proposed Project:

- The average volume capacity (V/C) ratio (or demand to capacity ratio) of the system would decrease to 0.840 and 0.877 during the A.M. and P.M. peak hours, respectively, compared to the average V/C ratio of 0.842 and 0.880 respectively, during the same peak hours for the Proposed Project.<sup>609</sup>
- Approximately 89 and 106 of the 218 analyzed intersection locations are projected to operate at unacceptable levels of service (LOS E or F) during the A.M. and P.M. peak hours, respectively, compared to 90 and 108 locations operating at unacceptable LOS E or F with the Proposed Project.
- The above two operating conditions, however, should be viewed in light of the fact that the 2010 base conditions analysis reveals that the average system V/C ratio without the Project is projected to be 0.833 and 0.867 during the A.M. and P.M. peak hours, respectively. Further, the number of intersection locations in 2010 base conditions that are projected to be operating at an unacceptable LOS E or F would be 84 and 104 during the A.M. and P.M. peak hours, respectively. Therefore, relative to 2010 base conditions, this alternative results in 5 and 2 more LOS E or F locations during the A.M. and P.M. peak hours, respectively, as opposed to 6 and 4 more LOS E and F intersections with the Proposed Project during the same peak hours.

It is expected that implementation of this alternative would include a mitigation program to reduce potentially significant impacts. With fewer trips, this alternative could be mitigated to the same level as the Proposed Project.

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<sup>609</sup> *The analysis of traffic impacts for the Alternatives assumed that the roadway improvements that are Project Design Features for the Proposed Project (e.g., improvements along Jefferson Boulevard and Bluff Creek Drive) would be implemented for all of the on-site Alternatives. The combination of these improvements, with the additional traffic from Alternative 2, would result in net improvement in V/C ratios.*

#### **4.4.2.K.(2) Parking**

As with the Proposed Project, the parking needs for this alternative would be met through application of the standards and review procedures established in the Area D Specific Plan, and no significant parking impacts would arise. This alternative would, like the Proposed Project result in the need for restricted parking along Centinela Avenue as would those of the Proposed Project. However, as with the Proposed Project, no significant parking impacts would occur.

#### **4.4.2.K.(3) Bicycle Plan**

Bikeways similar to those of the Proposed Project would be included in this alternative, and impacts to the existing bikeway system would be beneficial and less than significant under both plans. The impacts would, on net, be similar under both alternatives.

#### **4.4.2.L Public Services**

##### **4.4.2.L.(1) Fire Protection**

The Project site would be served either through the current facilities and/or construction of the new station on a dedicated site within the adjacent Playa Vista First Phase Project. This alternative would generate a population of 4,290 residents and 885 employees. Based on the current service level of 53 emergency incidents per 1,000 residents and employees, approximately 274 emergency incidents would occur on an annual basis. This is 92 emergency incidents (25 percent) less than the 366 emergency incidents occurring under the Proposed Project. Therefore, the impacts on fire protection services would be less than under the Proposed Project. Potential revenues to pay for services would also be reduced proportionately.

##### **4.4.2.L.(2) Police Protection**

Development occurring under this alternative would be served through the same facilities as the Proposed Project. This alternative would result in a population increase of 4,290 residents and 885 employees. In order to maintain the LAPD Pacific Area current service level of 1.17 police officers per 1,000 residents and employees, approximately 6 police officers with associated equipment would be required to provide police protection and to maintain the existing service level. This is 2 officers less than the 8 officers required by the Proposed Project. Therefore, the impacts on police protection services would be less than under the Proposed Project, but still significant. Potential revenues to pay for services would also be reduced proportionately.

#### 4.4.2.L.(3) Schools

The alternative would generate a total of 462 public school students distributed as follows: 228 elementary students, 108 junior high school students, and 126 high school students.<sup>610</sup> These amounts are less than those associated with the Proposed Project by 76, 37 and 4 students, respectively.

There is insufficient capacity to accommodate the students generated by this alternative at Playa del Rey Elementary School alone, without the availability of the Playa Vista Elementary School anticipated to be opened in the adjacent Playa Vista First Phase Project. With the availability of Playa Vista School there would be sufficient capacity. In comparison to the Proposed Project, the conditions described above are the same as those which occur with the Proposed Project. Although, insufficient capacity exists to accommodate all elementary school students generated by this alternative prior to the provision of new classrooms, as is the case with the Proposed Project. Notwithstanding, impacts would be fully mitigated through the payment of fees to the school district (pursuant to SB 50). Nonetheless, the reduced student generation with this alternative would result in a less net impact after mitigation.

The 108 junior high school students generated by this alternative could be accommodated within Marina del Rey Middle School, the junior high school which serves the Project site. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Marina del Rey Middle School.

The 126 high school students generated by this alternative would attend Venice High School. The high school students that would be generated by this alternative would not exceed the forecasted unused capacity at Venice High School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Venice High School.

#### 4.4.2.L.(4) Parks and Recreation

The 1,950 residential units proposed for development under Alternative 4, would generate a population increase of approximately 4,290. The Alternative would include 9.6 acres of park space that would be equivalent to 2 acres per 1,000 residents. In addition this park space

<sup>610</sup> The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project. The residential factors are weighted averages of the factors for the unit types represented in Table 142 on page 1011 of the Schools Analysis, with the following factors:

<i>Housing:</i>		<i>Employment:</i>	
<i>Elementary</i>	<i>0.105</i>	<i>Elementary</i>	<i>0.026</i>
<i>Junior High</i>	<i>0.050</i>	<i>Junior High</i>	<i>0.012</i>
<i>High School</i>	<i>0.059</i>	<i>High School</i>	<i>0.012</i>

would be improved and maintained in a manner similar to that of the Proposed Project. The alternative would also include 1.0 acre of bikeways similar to those of the Proposed Project. Therefore, as was the case with the Proposed Project, this alternative would meet the PRP's short- and intermediate-range standards for community and neighborhood parks of 2 acres per 1,000 residents, plus offer the added benefit of improvements and maintenance. As with the Proposed Project, impacts would be less than significant. However, with less total park space, this Alternative would result in a lower increase in park service ratios in the area than would the Proposed Project.

#### **4.4.2.L.(5) Libraries**

The alternative would generate a population of 4,290 residents within the Library service area. This is 1,430 fewer residents than the population generated by the Proposed Project. Therefore, the impacts on library services, which were less than significant with the Proposed Project, would be proportionately reduced and less than significant with the alternative. Potential revenues to pay for services would also be reduced proportionately.

#### **4.4.2.M Energy Consumption**

Under this alternative, an estimated 39.755 MWh of electricity and 363.546 net kcf of natural gas would be consumed on a daily basis, as shown in Table 205 on page 1338. This would represent approximately 25 percent less for electricity and natural gas consumption, than the Proposed Project. Both the alternative and the Proposed Project would create major sources of energy consumption and have a less-than-significant impact, but the alternative's impact would be reduced.

#### **4.4.2.N Utilities**

##### **4.4.2.N.(1) Water Consumption**

Average daily potable water consumption under this alternative would be about 0.377 million gallons per day (mgd) as shown in Table 206 on page 1338 as compared to 0.503 mgd for the Proposed Project. Based on the comparative differences in the nature and



Table 205

## ALTERNATIVE 4: ESTIMATED DAILY ENERGY CONSUMPTION

Demand Source	Quantity (Units)	Electricity		Natural Gas	
		Factor <sup>a</sup>	Consumption (MWh)	Factor <sup>b</sup>	Consumption (kcf)
Residential	1,950.0 d.u.	5626.5 kWh/d.u./year	30.059	5338.0 cf/d.u./month	342.217
Office	131.25 ksf	12.95 kWh/sf/year	4.657	2000.0 cf/ksf/month	8.630
Retail	112.50 ksf	13.55 kWh/sf/year	4.176	2900.0 cf/ksf/month	10.726
Community	30.0 ksf	10.50 kWh/sf/year	0.863	2000.0 cf/ksf/month	1.973
<b>Total Alternative 4</b>			<b>39.755</b>		<b>363.546</b>
<b>Total Proposed Project</b>			<b>53.007</b>		<b>484.728</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-25.0%</b>		<b>-25.0%</b>

*ksf = thousand square feet      d.u. = dwelling unit      kWh = kilowatt-hour      MWh = Megawatt-hour*  
*kcf = thousand cubic feet      sf = square feet      cf = cubic feet*

<sup>a</sup> *Electricity consumption factors based on Table A9-11-A of SCAQMD CEQA Air Quality Handbook (April 1993). Daily consumption was calculated using the annual factor divided by 365 days.*

<sup>b</sup> *Natural Gas consumption factors based on Table A9-12-A of SCAQMD CEQA Air Quality Handbook (April 1993) for monthly gas consumption. Daily consumption was calculated using monthly consumption factor multiplied by 12 and divided by 365 (~ 30.41 days/month).*

Source: Camp Dresser & McKee, Inc., 2003.

Table 206

## ALTERNATIVE 4: ESTIMATED DAILY POTABLE WATER CONSUMPTION

Demand Source	Quantity (Units)	Factor <sup>a</sup>	Consumption (mgd)
Residential	1,950 d.u.	0.000176 mgd/d.u.	0.343
Office	131.25 ksf	0.000165 mgd/ksf	0.022
Retail	112.50 ksf	0.000088 mgd/ksf	0.010
Community	30.00 ksf	0.000088 mgd/ksf	0.003
<b>Total Alternative 4</b>			<b>0.377</b>
<b>Total Proposed Project</b>			<b>0.503</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-25.0%</b>

*ksf = thousand square feet      d.u. = dwelling unit      mgd = million gallons per day*

<sup>a</sup> *Water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, wastewater generation factors. Wastewater generation factors are comparable to those for potable water consumption (90 percent of these for water for all factors), with the exception of office uses.*

Source: Camp Dresser & McKee, Inc., 2003.

amount of land uses proposed, Alternative 4 would have less water consumption from residential, office, retail, and community-serving uses. Overall, Alternative 4 would generate 25.0 percent less potable water demand than the Proposed Project and therefore would have a reduced and less-than-significant impact relative to the Proposed Project. As summarized in Table 207 on page 1340, reclaimed water usage under Alternative 4 would be 0.035 mgd, which is 31.4 percent less than the 0.0514 mgd of reclaimed water consumption associated with the Proposed Project.

#### **4.4.2.N.(2) Wastewater**

Wastewater generation under this alternative would be about 0.350 mgd as shown in Table 208 on page 1340 as compared to 0.467 mgd for the Proposed Project. Based on the comparative difference in the nature and amount of land proposed, Alternative 4 would have less wastewater generation from residential, office, retail and community-serving uses. Overall, Alternative 4 would generate 25.0 percent less wastewater than the Proposed Project. Similar to the Proposed Project, this alternative would have a less-than-significant impact on wastewater generation.

#### **4.4.2.N.(3) Solid Waste**

Solid Waste generation under this alternative would be about 14.188 tpd, as shown in Table 209 on page 1341 as compared to about 18.917 tpd net for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 4 would have less solid waste generation from residential, office, retail, and community-serving uses. Overall, this alternative would generate 25.0 percent less solid waste generation compared to the Proposed Project. Nonetheless, as with the Proposed Project, impacts would be significant.

#### **4.4.2.O Visual Qualities (Aesthetics and Views)**

**Aesthetics.** The permitted allowable floor area for development under this alternative would be 25 percent less than with the Proposed Project, with remaining development occurring within the same development areas as the Proposed Project. Thus, total building massing would be reduced, but the height restrictions of development across the site would remain the same as under the Proposed Project. The resulting development would be expected to contain a generally similar mix of uses and styles to that of the Proposed Project. The appearance of the alternative would be somewhat similar to that of the Proposed Project, particularly from ground level view locations, where site appearance would be dominated by landscaping treatments, and lower portions of buildings. The visual compatibility of developable areas within this alternative with surrounding land use, and structures would generally be comparable to that of the Proposed

Table 207

**ALTERNATIVE 4: ESTIMATED DAILY RECLAIMED WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor</b>	<b>Consumption (mgd)</b>
Office Cooling Towers	131.25 ksf	32 gpd/ksf <sup>a</sup>	0.004
Office Toilets	131.25 ksf	21 gpd/ksf <sup>a</sup>	0.003
Parks/Recreation Irrigation	7.7 acres	3,650 gpd/acre <sup>c</sup>	0.028
<b>Total Alternative 4</b>			<b>0.035</b>
<b>Total Proposed Project</b>			<b>0.051</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-31.4%</b> <sup>b</sup>

ksf = thousand square feet      gpd = gallons per day      mgd = million gallons per day

<sup>a</sup> Reclaimed water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, based on 4 employees per 1,000 sq.ft. of office space.

<sup>b</sup> The percentage of reclaimed water consumed under Alternative 4 does not represent an exact 25 percent reduction in consumption relative to the Proposed Project due to the fact that the landscaped area which would be irrigated under this alternative is reduced by 32.5 percent compared to the 11.4 acres under the Proposed Project. As such, the irrigation demand under Alternative 4 is reduced by 32.5 percent and the overall reclaimed water consumption is reduced by 31.4 percent compared to the Proposed Project.

<sup>c</sup> Landscape irrigation demand factor from Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992.

Source: Camp Dresser & McKee, Inc., 2003.

Table 208

**ALTERNATIVE 4: ESTIMATED DAILY WASTEWATER GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor<sup>a</sup></b>	<b>Generation (mgd)<sup>b</sup></b>
Residential	1,950 d.u.	0.000160 mgd/d.u.	0.312
Office	131.25 ksf	0.000203 mgd/ksf	0.027
Retail	112.50 ksf	0.00008 mgd/ksf	0.009
Community	30.00 ksf	0.00008 mgd/ksf	0.002
<b>Total Alternative 4</b>			<b>0.350</b>
<b>Total Proposed Project</b>			<b>0.467</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-25.0%</b>

ksf = thousand square feet      d.u. = dwelling unit      mgd = million gallons per day

<sup>a</sup> Wastewater generation factors from City of L.A. Draft Citywide CEQA Technical Guide. Wastewater generation factors are equal to 90 percent of water consumption factors, to account for surface infiltration and evaporation losses. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses, where reclaimed water is used for cooling towers and toilets, yielding a factor of 203 gpd/ksf or gpd/du.

<sup>b</sup> Solid waste generation presented in this table is prior to waste diversion, which would substantially reduce the amount of this waste requiring landfill disposal.

Source: Camp Dresser & McKee, Inc., 2003.

Table 209

**ALTERNATIVE 4: ESTIMATED DAILY SOLID WASTE GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (tpd) <sup>b</sup></b>
Residential	1,950 d.u.	0.00612 tpd/d.u.	11.934
Office	131.25 ksf	0.003 tpd/ksf	0.394
Retail	112.50 ksf	0.0156 tpd/ksf	1.755
Community	30.00 ksf	0.0035 tpd/ksf	0.105
<b>Total Alternative 4</b>			<b>14.188</b>
<b>Total Proposed Project</b>			<b>18.917</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-25.0%</b>

*ksf = thousand square feet      d.u. = dwelling unit      tpd = tons per day*

<sup>a</sup> *Solid waste generation factors based on the California Integrated Waste Management Board website, Waste Characterization database (www.ciwmb.ca.gov/WasteChar/WasteGenRates), November 2001.*

<sup>b</sup> *Solid waste generation presented in this table is prior to diversion, which would substantially reduce the amount of this waste requiring landfill disposal.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Project. Similar to the Proposed Project, this alternative would result in the loss of undeveloped area and related visual relief from the urban setting, a significant impact on aesthetics.

**Views.** From nearby, lower elevations, view impacts under this alternative would be similar to those of the Proposed Project. From atop the bluffs and more distant, higher elevations, the overall development form would be lower, causing a lesser affect on changes in the existing views. Although lessened, the view impacts from these locations would be similar to those of the Proposed Project. As with the Proposed Project the view impacts from these higher, more distant elevations would be less than significant. The potentially significant view impacts that do occur under the Proposed Project from locations along Jefferson Boulevard, would also occur under this alternative.

#### **4.4.2.P Cultural Resources**

##### **4.4.2.P.(1) Paleontological Resources**

Construction related activities, such as grading and excavation, could result in direct impacts on paleontological resources by covering or destroying fossiliferous rock units or exposing fossil bearing rock units to unauthorized collecting. At the same time, discovery of artifacts could occur with mitigation that would not otherwise occur. The amount of disturbed

ground cover with this alternative would be roughly equivalent to that of the Proposed Project. Impacts would be similar to the Proposed Project.

#### **4.4.2.P.(2) Archaeological Resources**

Construction related activities could disturb, destroy, or remove archaeological sites or artifacts and expose such resources to theft and vandalism. At the same time, collection, study and archiving of such artifacts could result from mitigation measures that would be implemented with a development program. The amount of ground cover with this alternative would be roughly equivalent to that of the Proposed Project. Impacts would be similar to the Proposed Project.

#### **4.4.2.P.(3) Historical Resources**

As with the Proposed Project, the existing structures located on the southern portion of the site would be demolished. However, these structures are not considered historical resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

### **4.4.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative impacts between this alternative and the Proposed Project is presented in Table 210 on pages 1344 through 1347. The reduced intensity alternative would reduce but not eliminate the Proposed Project's significant adverse impacts on traffic, regional air quality, construction noise, police and solid waste disposal. It would not eliminate the significant view impact along the short segment of Jefferson Boulevard adjacent to the Project site. Alternative 4 would also reduce the Proposed Project's non-significant impact levels on operational air quality and noise from operations, and other public services (with less revenue generation), safety/risk of upset, earth resources (seismic hazards), energy, and utilities. There would be reductions in total housing capacity and employment. This alternative would be beneficial for the jobs/housing balance, but not to the same extent as the Proposed Project.

### **4.4.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

This alternative would partially meet the objectives of the Proposed Project. It would be consistent with the objective of providing a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile, and increasing efficiency in the utilization of infrastructure. The objective of generating jobs, housing, and recreational opportunities would be somewhat achieved, although this alternative would provide a less substantial contribution to this objective than the Proposed Project due to the lower density of the alternative. This alternative would contribute to the supply of market housing and the City's

need for housing Citywide and in the Westside, in particular, but would do so at a level that is not as substantial in nature as with the Proposed Project. In addition, the reduction in units would inhibit the objective of providing housing within a wide price range. The Applicant's resource, protection and conservation goal could be met with this Alternative.

Table 210

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 4 (REDUCED INTENSITY BY 25%)  
TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Beneficial	Beneficial	Similar	Stabilization of bluffs, flood control improvements.
Dewatering/Subsidence	No Impact	No Impact	Similar	Dewatering may become necessary for excavation.
Seismic Hazards	Non-Significant	Non-Significant	Similar/Better	Construction to same code/Fewer people and structures exposed to risk.
Slope Stability	Non-Significant	Non-Significant	Similar	Same development near bluffs as Proposed Project.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Better	Less construction due to 25 percent less development.
Construction/Local Emissions	Non-Significant	Non-Significant	Better	Less construction due to 25 percent less development.
Operations/Regional Emissions	Significant	Significant	Better	Less traffic and energy consumption due to 25 percent less development, 22 percent fewer trips.
Operations/Local Emissions	Non-Significant	Non-Significant	Better	Less traffic and energy consumption due to 25 percent less development, 22 percent fewer trips.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Same amount of surface disturbance and addition of impervious surfaces.
Groundwater	Non-Significant	Non-Significant	Similar	Same amount of surface disturbance and addition of impervious surfaces.
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Similar potential with implementation of SWPPP and BMPs for both.
Groundwater	Non-Significant	Non-Significant	Similar	Similar potential and subject to the same regulations.
<b>Biotic Resources</b>				
Plant Life	Beneficial	Beneficial	Better	Reductions in indirect impacts; similar habitat restoration plan.
Animal Life	Beneficial	Beneficial	Better	Reductions in indirect impacts; similar habitat restoration plan.

Table 210 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 4 (REDUCED INTENSITY BY 25%)  
TO THE PROPOSED PROJECT**

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Noise</b>				
Construction	Significant	Significant	Better	Shorter duration of construction.
Stationary	Non-Significant	Non-Significant	Better	Fewer stationary sources due to reduction in land use intensity.
Mobile	Non-Significant	Non-Significant	Better	22 percent fewer daily trips.
<b>Light and Glare</b>				
Natural Light – Shading	Non-Significant	Non-Significant	Similar	Maximum effects could be the same or slightly less due to lower building heights that could result from 25 percent less development.
Artificial Light and Glare	Non-Significant	Non-Significant	Similar	Less building lighting, but essentially similar nighttime appearance.
<b>Land Use</b>				
Regulatory	Non-Significant	Non-Significant	Similar	Would require similar amendments to the District and Specific Plans.
Land Use Pattern	Non-Significant	Non-Significant	Similar	Same general use characteristics of mixed-use development.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Better	Less mineral resources needed.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Better	Less residential population exposed to potential safety/risk of upset hazards.
<b>Population, Housing and Employment</b>				
Population	Non-Significant	Non-Significant	Similar	Lower population levels than the Proposed Project.
Housing	Beneficial	Beneficial	Worse	25 percent less housing stock than the Proposed Project.
Employment	Beneficial	Beneficial	Worse	25 percent less employment opportunity than the Proposed Project.
Jobs/House Bal.	Beneficial	Beneficial	Similar	Internal jobs/housing ratios are beneficial and similar to the Proposed Project.



Table 210 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 4 (REDUCED INTENSITY BY 25%)  
TO THE PROPOSED PROJECT**

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Transportation</b>				
Traffic and Circulation	Significant	Significant	Better	22 percent fewer trips, with proportional decreases likely to occur on CMP intersections, freeway links, and public transit.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated.
Bicycle Plan	Beneficial	Beneficial	Similar	Less demand for bikeways and, thus, less improvements to bikeways.
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Police Protection	Significant	Significant	Better	Less demand, with proportionally less revenue.
Schools	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Parks and Recreation	Non-Significant	Non-Significant	Worse	Similar on-site park ratio, but with less park space, less increase in the community park service ratio.
Libraries	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Better	25.0 percent less natural gas demand and 25.0 percent less electrical consumption.
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Better	25.0 percent less daily potable water consumption and 31.4 percent less reclaimed water consumption.
Wastewater	Non-Significant	Non-Significant	Better	25.0 percent less daily wastewater generation.
Solid Waste	Significant	Significant	Better	25.0 percent less daily solid waste generation. Nonetheless, any exacerbation in demand is considered significant.
<b>Visual Quality (Aesthetics and Views)</b>				
Aesthetics	Significant	Significant	Similar	Same general site appearance.
Views	Significant	Significant	Better	Development confined to lower building heights. Significant impacts on Bluff views for travelers along Jefferson Boulevard would be similar.

Table 210 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 4 (REDUCED INTENSITY BY 25%)  
TO THE PROPOSED PROJECT**

Issue Areas	Alternative Net Impact	Proposed Project Net Impact	Comparison of Alternative	Result of Development of the Alternative
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Similar	Generally similar area disturbed with similar research mitigation.
Archaeological Resources	Non-Significant	Non-Significant	Similar	Generally similar area disturbed with similar research mitigation.
Historical Resources	No Impact	No Impact	Similar	In either case, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## 4.5 ALTERNATIVE 5: 25% REDUCTION – NO OFFICE OR RETAIL

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### 4.5.1 INTRODUCTION

This section presents an environmental analysis of an alternative development program aimed at reducing the overall amount of development. Housing, park space and community-serving uses would be reduced by 25 percent. Retail and office uses would be eliminated. This alternative would include 7.7 acres of active open space and 20 acres of passive open space. Table 211 on page 1349 compares this alternative with the Proposed Project for each of the major land uses and related project components.

Under this alternative, the physical form of development (i.e., massing of buildings) could take several forms. For the purposes of this analysis, it is assumed that the housing development would be of a similar style and density to that of the Proposed Project but would be located on a smaller portion of the Project site. The residual area would remain in unimproved open space in a single parcel that would extend from Jefferson Boulevard to Bluff Creek Drive. It is assumed that this alternative would include implementation of the riparian corridor and the bluff face restoration, similar to that of the Proposed Project.

For each environmental issue area, a comparative determination is made as to whether the overall mitigated adverse environmental impacts of this alternative would be better, similar, or worse than the corresponding Proposed Project impacts. A summary of comparative adverse impacts is presented at the end of the analysis for this Alternative in Table 218 on pages 1368 through 1371. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.

### 4.5.2 ANALYSIS

#### 4.5.2.A Earth

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

**Grading.** Under this alternative, less grading would be required due to the reduced overall development footprint. As development under this alternative would occur in proximity

Table 211

**COMPARISON OF ALTERNATIVE 5 COMPONENTS:  
REDUCED PROJECT TO THE PROPOSED PROJECT**

<b>Project Component</b>	<b>Unit</b>	<b>Alternative Project</b>	<b>Proposed Project</b>	<b>Numerical Difference</b>	<b>Percent Change</b>
Office	NSF	0	175,000	-175,000	-100%
Retail	NSF	0	150,000	-150,000	-100%
Community-Serving	GSF	30,000	40,000	-10,000	-25%
Total Housing	Units	1,950	2,600	-650	-25%
Active Open Space (Parks)	Acres	9.6	12.4	-2.8	-23% <sup>a</sup>

*NSF – net square feet      GSF – gross square feet*

<sup>a</sup> *Park space would be reduced 25 percent to 8.6 acres, and 1.0 acre of bicycle lanes could still be provided.*

*Source: PCR Services Corporation, 2003.*

to the bluffs, this alternative would still include stabilization of the bluffs as necessary, similar to the Proposed Project, and the net slope stability impact of this alternative would be comparable to that of the Proposed Project. Overall, development of this alternative would result in reduced grading impacts relative to those of the Proposed Project.

**Dewatering/Subsidence.** Because of the shallow groundwater level conditions which exist throughout the Project site, dewatering is likely to be required in certain areas requiring subsurface excavation, although this is dependent upon the actual construction techniques employed. Any dewatering which becomes necessary for development construction or for excavation would be done in accordance with dewatering permits issued by the Regional Water Quality Control Board (RWQCB). Prior to initiating any construction dewatering activities that are not included within the scope of the current Permit provisions, the Applicant/Contractor would be required to update the plans and provisions related to the Permit and notify the State Water Resources Control Board (SWRCB) of any such plan/provisions modifications. Ongoing, or permanent, dewatering that may occur as part of this alternative, as it relates to ongoing groundwater remediation activities and dewatering of sumps in subterranean structures (e.g., for subterranean parking and for methane safety systems), is not anticipated to be substantial relative to construction dewatering. Furthermore, it has been concluded that operation of the dewatering systems for subterranean parking and the methane safety systems would not result in any net subsidence at the Proposed Project site. As such, similar to the Proposed Project, dewatering activities from construction activities and from operation of proposed uses under this alternative are not anticipated to result in any net subsidence at the Proposed Project site, and a less-than-significant impact is anticipated.

**Seismic Hazards.** Groundshaking and fault rupture hazards would be the same as for other locations throughout the Los Angeles area, though the site is not located on, or in close proximity to active earthquake faults, as is the case with the Proposed Project. Although this alternative would have a smaller population than the Proposed Project (i.e., comparatively fewer people exposed to seismic hazards), buildings and other improvements constructed under this alternative would be subject to the same building and seismic codes as in the Proposed Project, producing similar protection from seismic activity.

As pertains to tsunami and seiche hazards under Alternative 5, all minimum finished pad and street elevations would be above tsunami limits, as would those of the Proposed Project; hence, tsunamis are unlikely to significantly affect development within the site. No water bodies with the potential to present seiche hazards to the project site exist in close proximity; as such, no seiche hazard would occur.

In order to avoid possible liquefaction (i.e., settlement) resulting in structural damage, structures would be designed to resist these effects and/or the underlying soils would be properly prepared. In the application of City structural engineering standards, liquefaction must be considered during structural design. Therefore, with the provisions required by City building and safety requirements and by the Uniform Building Code, people occupying the facilities would be protected, and damage would be minimized. No significant adverse impact from liquefaction to future structural uses is indicated due to required compliance with existing prerequisites for building permit issuance.

Impacts from ground lurching (i.e., the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks) would only affect the bluffs along the southern edge of the Proposed Project site. However, due to the geology and overall stability of the bluffs, lurching of the bluff face is not anticipated to occur. Although ground lurching is not expected to occur, the potential for any such impacts would be less for this alternative than for the Proposed Project, as less development would result in a reduced potential for persons or structures to be affected by such seismic hazards.

Overall, seismic impacts to development areas under this alternative would be reduced relative to the Proposed Project (given the reduction in population exposed to risk), for which the Proposed Project's impacts were found to be less than significant.

**Slope Stability.** Similar to the Proposed Project, the potential for slope instability is only a potential hazard along the southerly boundaries of the Project site adjacent to the bluffs. Also, the portions of the slopes below Cabora Road identified as having the potential for slope stability problems would be repaired in conjunction with construction of the Riparian Corridor. The

stabilization of the slopes below Cabora Road would achieve an acceptable factor of safety. As with the Proposed Project, the Riparian Corridor would provide distance between the bluffs and the development; therefore, no significant adverse impacts are expected to occur.

#### **4.5.2.B Air Quality**

The amount of site preparation under this alternative would not require as much excavation and grading activities compared to the Proposed Project and construction activities would be proportionally reduced based on the reduction in square footage. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease compared to the Proposed Project. The construction emissions generated with the alternative would be less than those of the Proposed Project over the entire construction period. However, impacts during maximum conditions, those used for measuring significance, would be similar to those of the Proposed Project and would be significant for regional construction emissions. Local emissions dispersions from fugitive dust emissions from grading would be similar to those of the Proposed Project, as the duration of excavation and grading would be greater, but not the daily activity. As such, local construction impacts under this alternative, as is the case with the Proposed Project would not be significant.

The number of daily trips generated by this alternative would be 51 percent less than the Proposed Project, resulting in proportionate decreases in mobile source emissions. Emissions from stationary sources would be reduced by 38 percent, however emissions from these sources comprise a very small portion of the alternative's overall emissions. The reductions in stationary and mobile source emissions would not be sufficient to avoid the significant impacts on CO, NO<sub>x</sub>, PM<sub>10</sub> and ROC that are associated with the Proposed Project. The total contributions to regional emissions under this alternative would be significant, as is the case with the Proposed Project. The reduction in traffic associated with this alternative (i.e., a reduction of 12,403 daily trip ends) would contribute to a proportionate decrease in localized emissions of carbon monoxide. The maximum predicted carbon monoxide concentration for the Proposed Project combined with 2010 base traffic was 7.1 ppm or 21 percent below the 9.0 ppm significance threshold for localized carbon monoxide. The Proposed Project resulted in approximately 6 percent of the pollutant concentration or 0.4 ppm. Therefore, a 51 percent decrease in daily trips generated by this alternative would decrease the increment from 0.4 ppm to 0.2 ppm and would be approximately 23 percent percent below the 9.0 ppm significance threshold for localized carbon monoxide.

### 4.5.2.C Water Resources

#### 4.5.2.C.(1) Hydrology

**Surface Water.** Impacts related to surface water hydrology would be similar to those of the Proposed Project. Less intensive development would occur under this alternative than under the Proposed Project, and therefore the amount of surface disturbance and addition of impervious surface area would be reduced under this alternative relative to the Proposed Project. As with the Proposed Project, it is anticipated that the storm drain system would be designed to accommodate a 50-year design storm, in accordance with City requirements. In addition, the same design features that are incorporated into the Proposed Project would be incorporated into this alternative to accommodate the increased runoff and provide an appropriate level of on-site flood protection, detention, and drainage. Flood protection measures would include additions and improvements to the existing storm drain system and the provision of stormwater retention facilities (Freshwater Marsh and Riparian Corridor) within the adjacent Playa Vista First Phase and Proposed Project sites. Alternative 5 proposes a reduction in development, and development would occur within a smaller area compared to the Proposed Project. As such, there would be a reduction in impervious surface area, though the design and construction of adequate flood control would be roughly similar to that of the Proposed Project. Therefore, similar to the Proposed Project, no significant impacts related to flooding or flood control are anticipated from development under this alternative.

**Groundwater.** The increase in impervious surfaces compared to existing conditions poses the potential to reduce groundwater recharge. However, since Alternative 5 proposes to decrease the intensity of development and developed area compared to the Proposed Project, the impacts related to groundwater hydrology would be comparatively better. Construction-related dewatering for subsurface excavation would be temporary and is not expected to have any long-term effects. The need for permanent dewatering systems would also likely be reduced under this alternative. No significant impacts to groundwater recharge and hydrology are expected to occur, as with the Proposed Project.

#### 4.5.2.C.(2) Water Quality

**Surface Water.** Similar to the Proposed Project, the surface water quality in the vicinity of the site under Alternative 5 could potentially be impacted both temporarily by construction activities and in the long-term by activities associated with the proposed land uses. The preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and appropriate best management practices (BMPs) during construction, would reduce the impacts to water quality to less than significant. Potential water quality impacts would be similar to the Proposed Project, and would not be significant.

**Groundwater.** Similar to the Proposed Project, groundwater quality is not expected to be significantly impacted by the development of Alternative 5. Groundwater resources could potentially be impacted by short-term construction activities and long-term changes in land use and recharge patterns. Short-term effects would be minimized due to the implementation of a SWPPP, the associated BMPs included in the plan, and compliance with NPDES requirements for dewatering. No long-term effects are anticipated because no industrial development is planned for the Project; any uses that involve storage of fuel or other hazardous material would be regulated under local, state, and federal laws. Impacts would be similar to the Proposed Project, and would not be significant.

#### **4.5.2.D Biotic Resources**

The reduction in Project density that would occur under this alternative would not significantly alter the direct impacts associated with the implementation of the Proposed Project. As stated, the amount of housing, park space and community-serving uses would be reduced by 25 percent and office and retail uses would be eliminated. For purposes of this analysis, the restoration of riparian and bluff habitat is assumed, as proposed to occur with the Proposed Project.

The reduction in land use intensity under this alternative would also incrementally reduce indirect impacts. Indirect impacts include increases in human use in adjacent natural areas, increased human and domestic animal presence, increases in the number of exotic and non-native plants species present in natural areas adjacent to urban development, and increases in light and glare in adjacent natural areas.

Under this alternative, a portion of the site would remain in passive open space, without modification to the existing vegetation that occurs as fragmented patches between roads, buildings, and parking lots. This alternative would allow the continued growth of non-native vegetation such as pampas grass and iceplant. Successional trends indicate that if left undisturbed, the site would not recover its historical biological state because of the severely altered hydrology that makes the site's vegetation dependent on variable rainfall instead of steady stream flow. Within this area, animal species diversity and abundance are low when compared with unfragmented native habitat of high quality. No special status species are known to depend on this area. As is the case with the Proposed Project, this alternative would have a beneficial impact on biotic resources.

#### **4.5.2.E Noise**

Because the type of construction associated with this alternative would be similar to the Proposed Project, daily construction-related noise levels experienced both within the Project site



and the immediate vicinity would be similar to those attributable to the Proposed Project and are considered significant. However, there would be fewer days of construction activity associated with this alternative since it reduces the amount of housing, park space and community-serving uses by 25 percent and eliminates retail and office uses.

A reduction in land use intensity would also result in a reduction in noise levels associated with operational on-site equipment and activity. The on-site equipment and activity noise levels associated with the Proposed Project are not considered significant and would be less so with this alternative. An expected reduction of 51 percent in traffic volumes associated with this alternative would yield a reduction in comparison to Proposed Project traffic noise.

#### **4.5.2.F Light and Glare**

##### **4.5.2.F.(1) Natural Light – Shading**

Total building massing would be reduced with this alternative and, thus, overall shading would be reduced. However, with height restrictions similar to those of the Proposed Project, the potential maximum shading impacts that would occur adjacent to sensitive off-site uses would be similar to the Proposed Project. As was the case with the Proposed Project, off-site shading impacts would be less than significant; and on-site shading effects would constitute design features of the Project and would not necessarily be adverse or beneficial.

##### **4.5.2.F.(2) Artificial Light and Glare**

With reduced building massing, the overall amount of lighting would be slightly reduced. However, the overall lighting profile and appearance would be similar to the Proposed Project. Both the Proposed Project and this alternative would cause lighting to blend with the surrounding area in similar ways. In both cases, lighting and use of non-reflective materials could be controlled to limit effects on off-site uses.

#### **4.5.2.G Land Use**

This alternative would reduce the intensity of the Proposed Project development by reducing the amount of development. Housing, park space and community-serving uses would be reduced by 25 percent. Retail and office uses would be eliminated. Such a reduction would lessen the amount of developed area available to meet regional growth demands in a clustered, mixed-use configuration. Some land use efficiencies anticipated in applicable plans would not be realized. Under this alternative, the resulting land use patterns in the area would be essentially the same as those that would occur with the Proposed Project, except that this alternative would not result in a self-contained, mixed-use community that promotes internally supportive uses that

decrease dependency on the automobile. As was the case with the Proposed Project, the land use designations shown in the existing District and Specific plans would need to be amended. Habitat creation and restoration would be similar to that of the Proposed Project.

#### **4.5.2.H Mineral Resources**

Potential mineral resource impacts would be similar to those of the Proposed Project, which were found to be not significant. There are no mineral (including petroleum) resources in the area of the Proposed Project site.

#### **4.5.2.I Safety/Risk of Upset**

**Hazardous Materials Management.** The amount of development would be considerably reduced under this alternative, and the amount of associated grading and area of ground disturbance would be less. Safety hazards similar to those of the Proposed Project would be involved in the excavation and construction activities near areas with known hazardous materials and in demolition. As under the Proposed Project, asbestos abatement during demolition must be performed in accordance with federal, state and local regulations, reducing the risk to levels deemed acceptable by the regulatory agencies responsible for protecting the health of the public. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

Construction dewatering may be required during the development of this alternative. As with the Proposed Project, dewatering discharge would be conducted in accordance with RWQCB requirements; therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

**Soil/Groundwater Contamination.** Much of the Project site was formerly occupied by industrial uses, particularly related to aircraft manufacturing, testing and repair (i.e., activities associated with the "Plant Site"). The vast majority of such uses occurred within the adjacent Playa Vista First Phase Project site east of the Proposed Project. Soil and groundwater contamination from past Plant Site activities was subsequently found in several areas, including some areas within the Proposed Project site: one area of known soil contamination, the former Temporary Drum Storage Area, has been remediated to the satisfaction of regulatory agencies and other areas are being, or will be, evaluated for remediation in conjunction with RWQCB's Cleanup and Abatement Order No. 98-125. Therefore, the impacts would be similar to those of the Proposed Project in development areas, which were found to not be significant, although the reduced overall development footprint under this alternative would reduce potential impacts relative to the Proposed Project.

**Soil Gas.** Potential safety and risk of upset impacts associated with methane-related hazards would be similar to those of the Proposed Project, which were found to be potentially significant; however, implementation of Project Design Features and other mitigation measures that would also apply to development under this alternative would reduce the impacts to a level that is less than significant. The results of the soil gas surveys completed in 1998 through 2001 found elevated levels of methane within shallow soils of the Project site. Such areas with elevated levels of methane are generally located in the southwest portion of the Project site (maximum concentration of 323,600 ppmv), although elevated levels of methane, ranging from approximately 13,000 ppmv to 44,400 ppmv, were detected in three other areas within the Proposed Project site. Only very low, if any, concentrations of hydrogen sulfide, benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected within the area of the Proposed Project. The majority of samples were “non-detect” for hydrogen sulfide based on a detection limit of one part per billion and no BTEX was detected based on detection limits of 0.07 part per billion by volume (ppbv). The maximum concentration detected for hydrogen sulfide and constituents of BTEX were 1.000 ppmv and 1.1 parts per million, respectively. These very low concentrations do not pose a significant health and safety risk. A comprehensive worker safety program specific to the potential for soil gases being encountered during grading and construction is proposed as a Project Design Feature. With regard to methane-related safety/risk of upset impacts associated with long-term operation of the Proposed Project or alternative, the application of a comprehensive methane management program as a Project Design Feature, which is assumed to also apply to this alternative, would serve to avoid significant impacts. The mitigation program would avoid significant health and safety impacts related to soil gas. Therefore, the impacts would be similar to those of the Proposed Project in areas to be developed, which were found to not be significant.

**Aviation Hazards.** Potential safety/risk of upset impacts associated with aviation hazards would be similar to those of the Proposed Project, which were concluded to be less than significant. Operation of the two heliports currently permitted within the adjacent Playa Vista First Phase Project site could pose potential safety/risk of upset impacts on future development within the Project site. Under this alternative, the heliport currently permitted within the site would not be developed as is the case with the Proposed Project. Heliport No. 1, located to the east of the Project site, poses a negligible risk, as its western flight path passes the area of the Proposed Project to the northeast and never crosses the site. Heliport No. 2, however, located just to the east of the easternmost lot of the Project site, may, in conjunction with the proposed building height districts for the development at the eastern end of the Project site, pose a potential safety/risk of upset impact related to aviation safety. Nonetheless, no significant impacts are anticipated to occur because, should the height of a new building in the Proposed Project extend into the subject air space and result in a conflict with operation of the heliport, the heliport is required to modify its flight path to eliminate the conflict or cease operations. Elimination or avoidance of such a conflict could be achieved if the heliport is relocated to a new suitable site or if the heliport is operated from the rooftop of a building. Overall, the potential for

safety/risk of upset impacts pertaining to heliport operations would be reduced relative to the Proposed Project, given the reduced development footprint proposed under this alternative (i.e., fewer buildings would be constructed that could interfere with flight paths).

#### **4.5.2.J Population, Housing and Employment**

Under this alternative, community-serving and housing uses would be 25 percent less than under the Proposed Project, and office and retail uses would be eliminated. A comparison of the resulting amounts of employment, housing and population with those of the Proposed Project, is presented in Table 212 on page 1358. This alternative would result in a population gain of 4,290 persons housed in 1,950 dwelling units. Total employment would be 60 jobs. With virtually no employment relative to residential population, this alternative would not internally contain a job/housing ratio that would be conducive to reductions in transportation and related impacts in the surrounding area. However, the new housing units would improve the jobs/housing ratio in the local area and sub-region by providing housing for off-site employees but not to the same degree as the Proposed Project. (The Proposed Project would reduce the current ratio of 2.66 to 2.43 in the local area, whereas the alternative would lower it to 2.46.) The number of jobs, housing and related population would fall within the growth range anticipated for the sub-region in the Growth Management Plan.

#### **4.5.2.K Transportation**

##### **4.5.2.K.(1) Traffic and Circulation**

This alternative generates 11,817 daily trip ends, representing 51 percent fewer trips than the Proposed Project's 24,220 trips. During the morning and evening peak hours, this alternative generates 869 and 1,067 trips respectively. This contrasts with 1,626 trips and 2,302 trips for the Proposed Project for the respective peak hours. This represents 47 percent and 54 percent fewer trips than the Proposed Project in the morning and evening peak hours, respectively. Trip generation provides a general indication of impacts on CMP intersections, freeway links, and public transit. Therefore, generally speaking, proportionate decreases would occur in each of these impact areas.

In order to provide a more detailed evaluation regarding traffic and circulation, an analysis of this alternative has been prepared to determine the number of trips generated and the impacts on roadway service levels at the 218 intersections analyzed in this EIR (see the Village at Playa Vista Traffic Report, Appendix K of this EIR). This analysis and its following summary are based on impacts prior to mitigation. Per this analysis, the alternative produces significant traffic impacts at approximately 6 percent and 7 percent of the analysis locations in the A.M. and P.M. peak hours, respectively, compared to 14 percent and 22 percent of the locations impacted

Table 212

**ALTERNATIVE 5: POPULATION, HOUSING AND EMPLOYMENT****Housing and Population**

	<u>Dwelling Units</u>	<u>Average Household Size</u>	<u>Population</u>
Alternative 5	1,950	2.2	4,290
Proposed Project	<b>2,600</b>	<b>2.2</b>	<b>5,720</b>
<b>+/- Compared to the Proposed Project</b>	<b>-650</b>		<b>-25%</b>

**Employees**

	<u>Office – Commercial Employment</u>						<u>Total Employment</u>
	<u>Office <sup>a</sup></u>		<u>Retail <sup>b</sup></u>		<u>Community-Serving <sup>c</sup></u>		
	<u>Quantity (SF)</u>	<u>Employment</u>	<u>Quantity (SF)</u>	<u>Employment</u>	<u>Quantity (SF)</u>	<u>Employment</u>	
Alternative 5	0	0	0	0	30,000	60	60
Proposed Project	175,000	700	150,000	400	40,000	80	<b>1,180</b>
<b>+/- Compared to the Proposed Project</b>							<b>-95%</b>

<sup>a</sup> Calculated by using a factor of 250 sq.ft. per employee.

<sup>b</sup> Calculated by using a factor of 375 sq.ft. per employee.

<sup>c</sup> Calculated by using a factor of 500 sq.ft. per employee.

Source: PCR Services Corporation.

by the Proposed Project during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a lesser degree than the Proposed Project. No significant differences in travel patterns outside the Project area would be expected between this alternative and the Proposed Project.

Analysis of the transportation system operating conditions in the future with the Project alternative reveals the following system performance characteristics in relation to those with the Proposed Project:

- The average volume capacity (V/C) ratio (or demand to capacity ratio) of the system would decrease to 0.838 and 0.873 during the A.M. and P.M. peak hours, respectively, compared to the average V/C ratio of 0.842 and 0.880 respectively, during the same peak hours for the Proposed Project.
- Approximately 87 and 105 of the 218 analyzed intersection locations are projected to operate at unacceptable levels of service (LOS E or F) during the A.M. and P.M. peak hours, respectively, compared to 90 and 108 locations operating at unacceptable LOS E or F with the Proposed Project.

- The above two operating conditions, however, should be viewed in light of the fact that the 2010 base conditions analysis reveals that the average system V/C ratio without the Project is projected to be 0.833 and 0.867 during the A.M. and P.M. peak hours, respectively. Further, the number of intersection locations in 2010 base conditions that are projected to be operating at an unacceptable LOS E or F would be 84 and 104 during the A.M. and P.M. peak hours, respectively. Therefore, relative to 2010 base conditions, this alternative results in 3 and 1 more LOS E or F locations during the A.M. and P.M. peak hours, respectively, as opposed to 6 and 4 more LOS E and F intersections with the Proposed Project during the same peak hours.

It is expected that implementation of this alternative would include a mitigation program to reduce potentially significant impacts. With fewer trips, this alternative could be mitigated to the same level as the Proposed Project.

#### **4.5.2.K.(2) Parking**

As with the Proposed Project, the parking needs for this alternative would be met through the application of the standards and review procedures established in the Area D Specific Plan. This alternative would, like the Proposed Project result in the need for restricted parking along Centinela Avenue as would those of the Proposed Project.

#### **4.5.2.K.(3) Bicycle Plan**

Bikeways similar to those of the Proposed Project would be included in this alternative, and impacts to the existing bikeway system would be beneficial and less than significant under both plans. The impacts would, on net, be similar to the Proposed Project.

#### **4.5.2.L Public Services**

##### **4.5.2.L.(1) Fire Protection**

The Project site would be serviced either through the current facilities and/or construction of the new station on a dedicated site within the adjacent Playa Vista First Phase Project. This alternative would generate a population of 4,290 residents and 60 employees. Based on the current service level of 53 emergency incidents per 1,000 residents and employees, approximately 231 emergency incidents would occur on an annual basis. This is 135 emergency incidents (37 percent) less than the 366 emergency incidents occurring under the Proposed Project. Therefore, the impacts on fire protection services would be less than under the Proposed Project. Potential revenues to pay for services would also be reduced proportionately.

#### 4.5.2.L.(2) Police Protection

Development occurring under this alternative would be served through the same facilities as the Proposed Project. This alternative would result in a population increase of 4,290 residents and 60 employees. In order to maintain the LAPD Pacific Area current service level of 1.17 police officers per 1,000 residents and employees, approximately 5 police officers with associated equipment would be required to provide police protection and to maintain the existing service level. This is 3 officers less than the 8 officers required by the Proposed Project. Therefore, the impacts on police protection services would be less than under the Proposed Project, but still significant. Potential revenues to pay for services would also be reduced proportionately.

#### 4.5.2.L.(3) Schools

The alternative would generate a total of 420 public school students distributed as follows: 206 elementary students, 98 junior high school students, and 116 high school students.<sup>611</sup> These amounts are less than those associated with the Proposed Project by 98, 47, and 51 students, respectively.

There is insufficient capacity to accommodate the students generated by this alternative at Playa del Rey Elementary School alone, without the availability of the Playa Vista Elementary School anticipated to be opened in the adjacent Playa Vista First Phase Project. With the availability of Playa Vista School there would be sufficient capacity. In comparison to the Proposed Project, the conditions described above are the same as those which occur with the Proposed Project. As such, insufficient capacity exists to accommodate all elementary school students generated by this alternative prior to the provision of new classrooms, as is the case with the Proposed Project. Notwithstanding, any impacts would be fully mitigated through the payment of fees to the school district (pursuant to SB 50). Nonetheless, the reduced student generation with this alternative would result in a less net impact after mitigation.

The 98 junior high school students generated by this alternative could be accommodated within Marina del Rey Middle School, the junior high school which serves the Project site.

<sup>611</sup> *The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project. The residential factors are weighted averages of the factors for the unit types represented in Table 142 on page 1011 of the Schools Analysis, with the following factors:*

<i>Housing:</i>		<i>Employment:</i>	
<i>Elementary</i>	<i>0.105</i>	<i>Elementary</i>	<i>0.026</i>
<i>Junior High</i>	<i>0.050</i>	<i>Junior High</i>	<i>0.012</i>
<i>High School</i>	<i>0.059</i>	<i>High School</i>	<i>0.012</i>

Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Marina del Rey Middle School.

The 116 high school students generated by this alternative would attend Venice High School. The high school students that would be generated by this alternative would not exceed the forecasted unused capacity at Venice High School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Venice High School.

#### **4.5.2.L.(4) Parks and Recreation**

The 1,950 residential units proposed for development under Alternative 5, would generate a population increase of approximately 4,290 persons. The Alternative would include 9.6 acres of park space that would be equivalent to 2 acres per 1,000 residents. In addition this park space would be improved and maintained in a manner similar to that of the Proposed Project. The alternative would also include 1.0 acre of bikeways similar to those of the Proposed Project. Therefore, as was the case with the Proposed Project, this alternative would meet the PRP's short and intermediate range standards for community and neighborhood parks of 2 acres per 1,000 residents, plus offer the added benefit of improvements and maintenance. As with the Proposed Project, impacts would be less than significant. However, with less total park space, this Alternative would result in a lower increase in park service ratios in the area than would the Proposed Project.

#### **4.5.2.L.(5) Libraries**

The alternative would generate a population of 4,290 residents within the Library service area. This is 1,430 fewer residents than the population generated by the Proposed Project. Therefore, the impacts on library services, which were less than significant with the Proposed Project, would be proportionately reduced and less than significant with the alternative. Potential revenues to pay for services would also be reduced proportionately.

#### **4.5.2.M Energy Consumption**

Under this alternative, an estimated 30.922 MWh of electricity and 344.190 kcf of natural gas and 31.0 MWh of electricity would be consumed on a daily basis, as shown in Table 213 on page 1362. This would represent approximately 41.7 percent less electrical, and 29.0 percent less natural gas, consumption than the Proposed Project. Both the alternative and the Proposed Project would create less-than-significant impacts on energy consumption, but the alternative's impact would be reduced significantly.



Table 213

**ALTERNATIVE 5: ESTIMATED DAILY ENERGY CONSUMPTION**

Demand Source	Quantity (Units)	Electricity		Natural Gas	
		Factor <sup>a</sup>	Consumption (MWh)	Factor <sup>b</sup>	Consumption (kcf)
Residential	1,950.0 d.u.	5626.5 kWh/d.u./year	30.059	5338.0 cf/d.u./month	342.217
Community	30.0 ksf	10.50 kWh/sf/year	0.863	2000.0 cf/ksf/month	1.973
<b>Total Alternative 5</b>			<b>30.922</b>		<b>344.190</b>
<b>Total Proposed Project</b>			<b>53.007</b>		<b>484.728</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-41.7%</b>		<b>-29.0%</b>

*ksf = thousand square feet      d.u. = dwelling unit      kWh = kilowatt-hour      MWh = Megawatt-hour*  
*kcf = thousand cubic feet      sf = square feet      cf = cubic feet*

<sup>a</sup> *Electricity consumption factors based on Table A9-11-A of SCAQMD CEQA Air Quality Handbook (April 1993). Daily consumption was calculated using the annual factor divided by 365 days.*

<sup>b</sup> *Natural Gas consumption factors based on Table A9-12-A of SCAQMD CEQA Air Quality Handbook (April 1993) for monthly gas consumption. Daily consumption was calculated using monthly consumption factor multiplied by 12 and divided by 365 (~ 30.41 days/month).*

*Source: Camp Dresser & McKee, Inc., 2003.*

#### 4.5.2.N Utilities

##### 4.5.2.N.(1) Water Consumption

Average daily potable water consumption under this alternative would be about 0.346 million gallons per day (mgd) as shown in Table 214 on page 1363 as compared to 0.503 mgd for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 5 would have less water consumption from residential, office, retail, and community-serving uses. Overall, Alternative 5 would generate 31.2 percent less potable water demand than the Proposed Project and therefore would have a reduced less-than-significant impact. As summarized in Table 215 on page 1363, reclaimed water usage under Alternative 5 would be 0.028 mgd, which is 45.1 percent less than the 0.051 mgd of reclaimed water consumption associated with the Proposed Project.

##### 4.5.2.N.(2) Wastewater

Wastewater generation under this alternative would be about 0.314 mgd as shown in Table 216 on page 1364 as compared to 0.467 mgd for the Proposed Project. Based on the comparative difference in the nature and amount of land proposed, Alternative 5 would have less

Table 214

**ALTERNATIVE 5: ESTIMATED DAILY POTABLE WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Consumption (mgd)</b>
Residential	1,950 d.u.	0.000176 mgd/d.u.	0.343
Community	30.00 ksf	0.000088 mgd/ksf	0.003
<b>Total Alternative 5</b>			<b>0.346</b>
<b>Total Proposed Project</b>			<b>0.503</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-31.2%</b>

*ksf = thousand square feet    d.u. = dwelling unit    mgd = million gallons per day*

<sup>a</sup> *Water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, wastewater generation factors. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Table 215

**ALTERNATIVE 5: ESTIMATED DAILY RECLAIMED WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor</b>	<b>Consumption (mgd)</b>
Office Cooling Towers	0.0 ksf	32 gpd/ksf <sup>a</sup>	0.000
Office Toilets	0.0 ksf	21 gpd/ksf <sup>a</sup>	0.000
Parks/Recreation Irrigation	7.7 acres	3,650 gpd/acre <sup>b</sup>	0.028
<b>Total Alternative 5</b>			<b>0.028</b>
<b>Total Proposed Project</b>			<b>0.051</b>
<b>% +/- Compared to the Proposed Project</b>			<b>45.1%</b>

*ksf = thousand square feet    gpd = gallons per day    mgd = million gallons per day*

<sup>a</sup> *Reclaimed water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, based on 4 employees per 1,000 sq.ft. of office space.*

<sup>b</sup> *Landscape irrigation demand factor from Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992*

*Source: Camp Dresser & McKee, Inc., 2003.*

wastewater generation from residential, office, retail and community-serving uses. Overall, Alternative 4 would generate 32.8 percent less wastewater than the Proposed Project. As with the Proposed Project, this alternative would have a less-than-significant impact on wastewater consumption.

Table 216

**ALTERNATIVE 5: ESTIMATED DAILY WASTEWATER GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (mgd)</b>
Residential	1,950 d.u.	0.000160 mgd/d.u.	0.312
Community	30.00 ksf	0.00008 mgd/ksf	0.002
<b>Total Alternative 5</b>			<b>0.314</b>
<b>Total Proposed Project</b>			<b>0.467</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-32.8%</b>

*ksf = thousand square feet d.u. = dwelling unit mgd = million gallons per day*

<sup>a</sup> *Wastewater generation factors from City of L.A. Draft Citywide CEQA Technical Guide. Wastewater generation factors are equal to 90 percent of water consumption factors, to account for surface infiltration and evaporation losses. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses, where reclaimed water is used for cooling towers and toilets, yielding a factor of 203 gpd/ksf or gpd/du.*

*Source: Camp Dresser & McKee, Inc., 2003.*

**4.5.2.N.(3) Solid Waste**

Solid Waste generation under this alternative would be about 12.039 tpd, as shown in Table 217 on page 1365 as compared to about 18.917 tpd net for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 5 would have less solid waste generation from residential, office, retail, and community-serving uses. Overall, this alternative would generate 36.4 percent less solid waste generation compared to the Proposed Project, but would similarly have a significant impact.

**4.5.2.O Visual Qualities (Aesthetics and Views)**

**Aesthetics.** The aesthetic impacts with this Alternative would be substantially similar to those of the Proposed Project. The additional pocket of open space included in this alternative would reduce the Proposed Project's significant impact on the availability of undeveloped land, and related visual relief from urban development. However, the loss of undeveloped land, while somewhat reduced, would still be substantial. As with the Proposed Project, this impact would

**Views.** The view impacts with this alternative would be substantially similar to those of the Proposed Project. The additional pocket of undeveloped area included in Alternative 5 would provide a view corridor allowing bluff views from Jefferson Boulevard. However, appreciation of the view could only occur for population directly opposite the corridor, and looking towards the south away from the thoroughfare. Therefore, the impact on views from

Table 217

**ALTERNATIVE 5: ESTIMATED DAILY SOLID WASTE GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor<sup>a</sup></b>	<b>Generation (tpd)<sup>b</sup></b>
Residential	1,950 d.u.	0.00612 tpd/d.u.	11.934
Community	30.00 ksf	0.0035 tpd/ksf	0.105
<b>Total Alternative 5</b>			<b>12.039</b>
<b>Total Proposed Project</b>			<b>18.917</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-36.4%</b>

*ksf = thousand square feet d.u. = dwelling unit tpd = tons per day*

<sup>a</sup> *Solid waste generation factors based on the California Integrated Waste Management Board website, Waste Characterization database ([www.ciwmb.ca.gov/WasteChar/WasteGenRates](http://www.ciwmb.ca.gov/WasteChar/WasteGenRates)), November 2001.*

<sup>b</sup> *Solid waste generation presented in this table is prior to waste diversion, which would substantially reduce the amount of this waste requiring landfill disposal.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Jefferson Boulevard would be improved only slightly with this alternative and the remaining loss of views of the bluffs would still be considered significant. From atop the bluffs, the near view would be a little less impacted than that of the Proposed Project, but again this would only be noticeable for viewers directly opposite from the view corridor. For the most part, views would be substantially similar to those of the Proposed Project.

#### **4.5.2.P Cultural Resources**

##### **4.5.2.P.(1) Paleontological Resources**

Construction related activities, such as grading and excavation, could result in direct impacts on paleontological resources by covering or destroying fossiliferous rock units or exposing fossil bearing rock units to unauthorized collecting. At the same time, discovery of artifacts could occur with mitigation that would not otherwise occur. The amount of disturbed ground cover with this alternative would be less than that of the Proposed Project. The potential adverse and beneficial impacts would off-set and on net, impacts would be similar to the Proposed Project.

##### **4.5.2.P.(2) Archaeological Resources**

Construction related activities could disturb, destroy, or remove archaeological sites or artifacts and expose such resources to theft and vandalism. At the same time, collection, study and archiving of such artifacts could result from mitigation measures that would be implemented

with a development program. The amount of disturbed ground cover with this alternative would be less than that of the Proposed Project. The potential adverse and beneficial impacts would offset and on net, impacts would be similar to the Proposed Project.

#### **4.5.2.P.(3) Historical Resources**

As with the Proposed Project, the existing structures located on the southern portion of the site would be demolished. However, these structures are not considered historical resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

### **4.5.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative impacts between this alternative and the Proposed Project is presented in Table 218 on pages 1368 through 1371. This alternative would reduce but not eliminate the Proposed Project's significant adverse impacts on traffic, regional air quality, construction noise, police services and solid waste disposal. It would not eliminate the significant aesthetics/view impact along the segment of Jefferson Boulevard adjacent to the Project site. Alternative 5 would also reduce the Proposed Project non-significant impact levels on local air quality and noise, other public services, safety/risk of upset, earth resources (grading and seismic hazards), hydrology, energy, and utilities. There would be reductions in total housing capacity, and employment. This alternative would be beneficial for the jobs/housing balance in the local area and region, but not to the same extent as the Proposed Project even though the on-site ratio would be better..

### **4.5.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

This alternative would partially address some of the basic objectives of the Proposed Project. This alternative would help to meet the supply of market housing and the City's need for housing Citywide and in the Westside, in particular, but would do so at a level that is not as substantial in nature as with the Proposed Project. In addition, the reduction in units would inhibit the objective of providing housing within a wide price range. Also, the Applicant's resource, protection and conservation goal would be met with this Alternative. The objective of generating housing would be somewhat achieved, although this alternative would provide a less substantial contribution to this objective than the Proposed Project due to the lower density of the alternative. The objective of generating a substantial number of jobs would not be addressed. This alternative would not be consistent with the objective of providing a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile with resultant

traffic, air quality and noise benefits, and that creates greater efficiencies in the utilization of infrastructure.

Table 218

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 5 (25% REDUCTION –  
NO OFFICE OR COMMERCIAL) TO THE PROPOSED PROJECT\***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Beneficial	Beneficial	Similar/Better	Stabilization of bluffs, flood control improvements, but less grading volume and ground disturbance.
Dewatering/Subsidence	No Impact	No Impact	Similar	Dewatering may become necessary for excavation.
Seismic Hazards	Non-Significant	Non-Significant	Similar/Better	Construction to same code, but fewer people and structures exposed to seismic risk.
Slope Stability	Non-Significant	Non-Significant	Similar	Same development near bluffs as Proposed Project.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Better	Less construction due to residential uses only at 25 percent reduction.
Construction/Local Emissions	Non-Significant	Non-Significant	Better	Less construction due to residential uses only at 25 percent reduction.
Operations/Regional Emissions	Significant	Significant	Better	Less traffic and energy consumption due to residential uses only at 25 percent reduction, 51 percent fewer trips.
Operations/Local Emissions	Non-Significant	Non-Significant	Better	Less traffic and energy consumption due to residential uses only at 25 percent reduction, 51 percent fewer trips.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Better/Similar	Reduced surface disturbance and addition of impervious surfaces, but overall similar runoff rates and stormwater facilities.
Groundwater	Non-Significant	Non-Significant	Better/Similar	Reduced surface disturbance and addition of impervious surfaces, but recharge rates would not vary substantially.
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Similar potential with implementation of SWPPP and BMPs for both.
Groundwater	Non-Significant	Non-Significant	Similar	Similar potential and subject to the same regulations.
<b>Biotic Resources</b>				
Plant Life	Beneficial	Beneficial	Better	Reductions in direct and indirect impacts; similar habitat restoration plan.

Table 218 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 5 (25% REDUCTION –  
NO OFFICE OR COMMERCIAL) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Noise</b>				
Construction	Significant	Significant	Better	Shorter duration of construction.
Stationary	Non-Significant	Non-Significant	Better	Fewer stationary sources due to reduction in land use intensity.
Mobile	Non-Significant	Non-Significant	Better	51 percent fewer daily trips.
<b>Light and Glare</b>				
Natural Light – Shading	Non-Significant	Non-Significant	Similar	Maximum effects of building heights would be similar to those of the Proposed Project.
Artificial Light and Glare	Non-Significant	Non-Significant	Similar	Less building lighting, but essentially similar nighttime appearance.
<b>Land Use</b>				
Regulatory	Non-Significant	Non-Significant	Similar	Would require similar amendments to the District and Specific Plans.
Land Use Patterns	Non-Significant	Non-Significant	Worse	Would not offer benefits of mixed-use development.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Similar	No mineral resources are present on the Project site.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Similar/Better	Less residential population exposed to potential safety/risk of upset hazards.
<b>Population, Housing and Employment</b>				
Population	Non-Significant	Non-Significant	Similar	Lower population levels than the Proposed Project.
Housing	Beneficial	Beneficial	Worse	25 percent less housing stock than the Proposed Project.
Employment	Beneficial	Beneficial	Worse	95 percent less employment opportunity than the Proposed Project.
Jobs/House Bal.	Beneficial	Beneficial	Better/Worse	Internal jobs/housing ratios are more beneficial than the Proposed Project, however, contribution to jobs/housing ratio in the jobs rich Local Area would be slightly less.



Table 218 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 5 (25% REDUCTION –  
NO OFFICE OR COMMERCIAL) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Transportation</b>				
Traffic and Circulation	Significant	Significant	Better	51 percent fewer trips, with proportional decreases likely to occur on CMP intersections, freeway links, and public transit.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated.
Bicycle Plan	Beneficial	Beneficial	Similar	Similar bikeway improvements could be provided.
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Police Protection	Significant	Significant	Better	Less demand, with proportionally less revenue.
Schools	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Parks and Recreation	Non-Significant	Non-Significant	Worse	Similar on-site park ratio, but with less total park space and less increase in the community park service ratio.
Libraries	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Better	41.7 percent less electricity and 29.0 percent less natural gas consumption.
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Better	31.24 percent less daily potable water consumption and 45.1 percent less reclaimed water consumption.
Wastewater	Non-Significant	Non-Significant	Better	32.8 percent less daily wastewater generation.
Solid Waste	Significant	Significant	Better	36.4 percent less daily solid waste generation. Nonetheless, any exacerbation in demand is considered significant.
<b>Visual Quality (Aesthetics and Views)</b>				
Aesthetics	Significant	Significant	Similar	Similar site appearance. Loss of undeveloped area would be less, but still substantial.
Views	Significant	Significant	Better	Development confined to lower building heights. Significant impacts on Bluff views for travelers along Jefferson Boulevard would be reduced.

Table 218 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 5 (25% REDUCTION –  
NO OFFICE OR COMMERCIAL) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Similar	Smaller area disturbed with less research potential.
Archaeological Resources	Non-Significant	Non-Significant	Similar	Smaller area disturbed with less research potential.
Historical Resources	No Impact	No Impact	Similar	In both cases, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## **4.6 ALTERNATIVE 6: 75% REDUCED RESIDENTIAL; NO OFFICE, RETAIL, OR COMMUNITY-SERVING USES.**

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### **4.6.1 INTRODUCTION**

This section presents an environmental analysis of an alternative development program aimed at substantially reducing the overall amount of development. Under this alternative, residential uses would be reduced by 75 percent. Office, retail, and community-serving uses would be eliminated. Table 219 on page 1373 compares this alternative with the Proposed Project for each of the major land uses and related project components.

Under this alternative, development would occupy the same general areas as the Proposed Project. However, the development would be confined to a low-density residential project with approximately 10 dwelling units per acre. The development could include a mix of stand-alone and attached town houses, and/or low-rise condominium style units. Development would typically be two-story buildings, with some one- and possibly three-story buildings. A proportional amount of park space is included. It is assumed that this alternative would include implementation of the riparian corridor and the bluff face restoration, similar to that of the Proposed Project.

For each environmental issue area, a comparative determination is made as to whether the overall mitigated adverse environmental impacts of this alternative would be better, similar, or worse than the corresponding Proposed Project impacts. A summary of comparative adverse impacts is presented at the end of the analysis for this Alternative in Table 226 on pages 1391 through 1394. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.

### **4.6.2 ANALYSIS**

#### **4.6.2.A Earth**

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

Table 219

**COMPARISON OF ALTERNATIVE 6 COMPONENTS:  
REDUCED PROJECT TO THE PROPOSED PROJECT**

<b>Project Component</b>	<b>Unit</b>	<b>Alternative Project</b>	<b>Proposed Project</b>	<b>Numerical Difference</b>	<b>Percent Change</b>
Office	NSF	0	175,000	-175,000	-100%
Retail	NSF	0	150,000	-150,000	-100%
Community-Serving	GSF	0	40,000	-40,000	-100%
Total Housing	Units	650	2,600	-1,950	-75%
Active Open Space (Parks) <sup>a</sup>	Acres	3.9	12.4	-8.2	-69%

*NSF – net square feet      GSF – gross square feet*

<sup>a</sup> *Park space would be reduced by 75 percent to 2.9 acres, and 1.0 acre of bicycle lanes could still be provided.*

*Source: PCR Services Corporation, 2003.*

**Grading.** Under this alternative, the areas developed would be similar to those of the Proposed Project, but less grading would be required due to the reduced overall development intensity and associated depth of excavations for building pads (and lack of subterranean parking). This alternative would still include stabilization of the bluffs as necessary, similar to the Proposed Project, and the net slope stability impact of this alternative would be comparable to that of the Proposed Project. Overall, development of this alternative would result in reduced grading impacts relative to those of the Proposed Project.

**Dewatering/Subsidence.** Because of the shallow groundwater conditions which exist throughout the Project site, dewatering is likely to be required in certain areas requiring subsurface excavation, although this is dependent upon the actual construction techniques employed. Any dewatering which becomes necessary for development construction or for excavation would be done in accordance with dewatering permits issued by the Regional Water Quality Control Board (RWQCB). Prior to initiating any construction dewatering activities that are not included within the scope of the current Permit provisions, the Applicant/Contractor would be required to update the plans and provisions related to the Permit and notify the State Water Resources Control Board (SWRCB) of any such plan/provisions modifications. Ongoing, or permanent, dewatering that may occur as part of this alternative, such as relates to ongoing groundwater remediation activities and dewatering of sumps in subterranean structures (e.g., for methane safety systems), is not anticipated to be substantial relative to construction dewatering. Furthermore, it is concluded that the operation of dewatering systems for the methane safety systems would not result in any net subsidence at the Proposed Project site. As such, similar to the Proposed Project, dewatering activities from construction activities and from operation of proposed uses under this alternative are not anticipated to result in any net subsidence at the Proposed Project site, and a less-than-significant impact is anticipated.

**Seismic Hazards.** Groundshaking and fault rupture hazards would be the same as for other locations throughout the Los Angeles area, though the site is not located on, or in close proximity to active earthquake faults, as is the case with the Proposed Project. Although this alternative would have a smaller population than the Proposed Project (i.e., comparatively fewer people exposed to seismic hazards), buildings and other improvements constructed under this alternative would be subject to the same building and seismic codes as in the Proposed Project, producing similar protection from seismic activity.

As pertains to tsunami and seiche hazards under Alternative 6, all minimum finished pad and street elevations would be above tsunami limits, as would those of the Proposed Project; hence, tsunamis are unlikely to significantly affect development within the site. No water bodies with the potential to present seiche hazards to the project site exist in close proximity; as such, no seiche hazard would occur.

In order to avoid possible liquefaction (i.e., settlement) resulting in structural damage, structures would be designed to resist these effects and/or the underlying soils would be properly prepared. In the application of City structural engineering standards, liquefaction must be considered during structural design. Therefore, with the provisions required by City building and safety requirements and by the Uniform Building Code, people occupying the facilities would be protected, and damage would be minimized. No significant adverse impact from liquefaction to future structural uses is indicated due to required compliance with existing prerequisites for building permit issuance.

Impacts from ground lurching (i.e., the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks) would only affect the bluffs along the southern edge of the Proposed Project site. However, due to the geology and overall stability of the bluffs, lurching of the bluff face is not anticipated to occur. Ground lurching is not expected to occur, and the potential for any such impacts under Alternative 6 would be similar to the Proposed Project, roughly the same development area would result in a similar potential for persons or structures to be affected by such seismic hazards.

Overall, seismic impacts to development areas under this alternative would be reduced relative to the Proposed Project (given the reduction in population exposed to risk, despite a similar development footprint), for which the impacts were found to be less than significant.

**Slope Stability.** Similar to the Proposed Project, the potential for slope instability is only a potential hazard along the southerly boundaries adjacent to the bluffs. Also, the portions of the slopes below Cabora Road identified as having the potential for slope stability problems would be repaired in conjunction with construction of the Riparian Corridor. The stabilization of the

slopes below Cabora Road would achieve an acceptable factor of safety. As with the Proposed Project, the Riparian Corridor would provide distance between the bluffs and the development; therefore, no significant adverse impacts are expected to occur.

#### **4.6.2.B Air Quality**

The amount of site preparation under this alternative would not require as much excavation and grading activities compared to the Proposed Project and construction activities would be proportionally reduced based on the reduction in development. However, pollutant emissions and fugitive dust from site preparation and construction activities would be similar on a daily basis, as the duration and not the intensity of these activities could decrease under this alternative when compared to the Proposed Project. The construction emissions generated with the alternative would be less than those of the Proposed Project over the entire construction period. However, impacts during maximum construction activity levels, those used for measuring significance, would be similar to those of the Proposed Project and would be significant for regional construction emissions. Local emissions dispersions from fugitive dust emissions from grading would be similar to those of the Proposed Project, as the duration of excavation and grading would be less but not the daily activity. As such, local construction impacts under this alternative, as is the case with the Proposed Project, would not be significant.

The number of daily trips generated by this alternative would be 84 percent less than the Proposed Project, resulting in proportionate decreases in mobile source emissions. Emissions from stationary sources would be reduced by 80 percent, however emissions from these sources comprise a very small portion of the alternative's overall emissions. The reductions in stationary and mobile source emissions would be sufficient to avoid the significant impact on CO and PM<sub>10</sub> associated with the Proposed Project, but would not be sufficient to avoid the significant impact on NO<sub>x</sub> and ROC that are associated with the Proposed Project. The total contributions to regional emissions under this alternative would be significant, as was the case with the Proposed Project. The reduction in traffic associated with this alternative (i.e., a reduction of 20,411 daily trip ends) would contribute to a proportionate decrease in localized emissions of carbon monoxide. The maximum predicted carbon monoxide concentration for the Proposed Project combined with 2010 base traffic was 7.1 ppm or 21 percent below the 9.0 ppm significance threshold for localized carbon monoxide. The Proposed Project resulted in approximately 6 percent of the pollutant concentration or 0.4 ppm. Therefore, an 84 percent decrease in daily trips generated by this alternative would decrease the increment from 0.4 ppm to 0.1 ppm and would be approximately 25 percent below the 9.0 ppm significance threshold for localized carbon monoxide.

#### 4.6.2.C Water Resources

##### 4.6.2.C.(1) Hydrology

**Surface Water.** Impacts related to surface water hydrology would be similar to those of the Proposed Project. Although there would be less intensive development occurring under this alternative than under the Proposed Project, it is anticipated that the amount of surface disturbance and addition of impervious surface area would be the same for the alternative and the Proposed Project, since buildings would occupy a similar amount of area, with comparable building pad locations. As with the Proposed Project, it is anticipated that the storm drain system would be designed to accommodate a 50-year design storm, in accordance with City requirements. In addition, the same design features would be incorporated to accommodate the increased runoff and provide an appropriate level of on-site flood protection, detention, and drainage. Flood protection measures would include additions and improvements to the existing storm drain system and the provision of stormwater retention facilities (Freshwater Marsh and Riparian Corridor) within the adjacent Playa Vista First Phase and Proposed Project sites. Alternative 6 proposes a reduction in development, but it would occur within roughly the same locations as the Proposed Project. As such, there would not be a substantial increase in impervious surface area, and the design and construction of adequate flood control would be roughly the same as that of the Proposed Project. No significant adverse impacts related to flooding or flood control are anticipated from development under this alternative.

**Groundwater.** The increase in impervious surfaces compared to existing conditions poses the potential to reduce groundwater recharge. Since Alternative 6 proposes to decrease the intensity of development compared to the Proposed Project, the impacts related to groundwater hydrology would be comparatively similar. Construction-related dewatering for subsurface excavation would be temporary and is not expected to have any long-term effects. The need for permanent dewatering systems would also likely be reduced under this alternative given the fact that the depth of excavations for buildings would be substantially reduced under this alternative. No significant impacts to groundwater recharge and hydrology are expected to occur, as with the Proposed Project.

##### 4.6.2.C.(2) Water Quality

**Surface Water.** Similar to the Proposed Project, the surface water quality in the vicinity of the site under Alternative 6 could potentially be impacted both temporarily by construction activities and in the long-term by activities associated with the proposed residential land uses. The preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and appropriate best management practices (BMPs) during construction would reduce the impacts to

water quality to less than significant. Potential water quality impacts would be similar to the Proposed Project, and would not be significant.

**Groundwater.** Similar to the Proposed Project, groundwater quality is not expected to be significantly impacted by the development of Alternative 6. Groundwater resources could potentially be impacted by short-term construction activities and long-term changes in land use and recharge patterns. Short-term effects would be minimized due to the implementation of a SWPPP, the associated BMPs included in the plan, and compliance with NPDES requirements for dewatering. No long-term effects are anticipated because no industrial development is planned for the Project; any uses that involve storage of fuel or other hazardous material would be regulated under local, state, and federal laws.

#### **4.6.2.D Biotic Resources**

Although the Project density would be reduced with this alternative, the area of development would be similar to the Proposed Project and the direct impacts on biotic resources would be similar to the Proposed Project. However, the reduction in land use intensity would incrementally reduce indirect impacts, e.g., increases in human use in adjacent natural areas, increased human and domestic animal presence, and increases in the number of exotic and non-native plants species present in natural areas adjacent to urban development. For purposes of this analysis, restoration of riparian and bluff habitat is assumed, as with the Proposed Project.

#### **4.6.2.E Noise**

Because the type of construction associated with this alternative would be somewhat similar to the Proposed Project, daily construction-related noise levels experienced both within the Project site and the immediate vicinity would be similar to the Proposed Project and are considered significant. However, there would be fewer days of construction activity associated with this alternative since it reduces the amount of housing and parks by 75 percent and eliminates all other uses.

A reduction in land use intensity would also result in a reduction in noise levels associated with operational on-site equipment and activity. The on-site equipment and activity noise levels associated with the Proposed Project are not considered significant and would be less so with this alternative. An expected reduction of 84 percent in traffic volumes associated with this alternative would yield a slight reduction in comparison to Proposed Project traffic noise.



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#### **4.6.2.F Light and Glare**

##### **4.6.2.F.(1) Natural Light – Shading**

Total building massing would be reduced with this alternative and, thus, overall shading would be reduced. As was the case with the Proposed Project, off-site shading impacts would be less than significant; and on-site shading effects would constitute design features of the Project and would not necessarily be adverse or beneficial.

##### **4.6.2.F.(2) Artificial Light and Glare**

With reduced building massing, the overall amount of lighting would be somewhat reduced. However, the overall lighting profile and appearance would be somewhat similar to the Proposed Project. Both the Proposed Project and this alternative would cause lighting to blend with the surrounding area in similar ways. In both cases, lighting and use of non-reflective materials could be controlled to limit effects on off-site uses.

#### **4.6.2.G Land Use**

This alternative would reduce the intensity of the Proposed Project development by reducing the amount of development. Residential uses and park space would be reduced by 75 percent. Retail, office and community uses would be eliminated. These reductions would result in a low-density residential development which would lessen the amount of developed area available to meet regional growth demands in a higher-density clustered, mixed-use configuration and would not result in a self-contained, mixed-use community that promotes internally supportive uses that decrease dependency on the automobile.

As was the case with the Proposed Project, the land use designations shown in the existing District and Specific plans would need amendment. Habitat creation and restoration is assumed to be similar to that of the Proposed Project.

#### **4.6.2.H Mineral Resources**

Potential mineral resource impacts would be similar to those of the Proposed Project, which were found to be not significant. There are no mineral (including petroleum) resources in the area of the Proposed Project site.

#### 4.6.2.I Safety/Risk of Upset

**Hazardous Materials Management.** Even though the amount of development would be substantially reduced with this alternative (75 percent less residential development and no other land use development) and the amount of grading would be less, the location of ground area disturbed would be similar. Safety hazards similar to those of the Proposed Project would be involved in the excavation and construction activities near areas with known hazardous materials and in demolition. As under the Proposed Project, asbestos abatement during demolition must be performed in accordance with federal, state and local regulations, reducing the risk to levels deemed acceptable by the regulatory agencies responsible for protecting the health of the public. Therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant.

Construction dewatering may be required during project development. As with the Proposed Project, dewatering discharge would be conducted in accordance with RWQCB requirements; therefore, the impacts would be similar to those of the Proposed Project, which were found to not be significant, though the amount of dewatering discharge would be substantially reduced.

**Soil/Groundwater Contamination.** Much of the Project site was formerly occupied by industrial uses, particularly related to aircraft manufacturing, testing and repair (i.e., activities associated with the “Plant Site”). The vast majority of such uses occurred within the adjacent Playa Vista First Phase Project site east of the Proposed Project. Soil and groundwater contamination from past Plant Site activities was subsequently found in several areas, including some areas within the area of the Proposed Project: one area of known soil contamination, the former Temporary Drum Storage Area, has been remediated to the satisfaction of regulatory agencies and other areas are being, or will be, evaluated for remediation in conjunction with RWQCB’s Cleanup and Abatement Order No. 98-125. Therefore, the impacts would be similar to those of the Proposed Project in development areas, which were found to not be significant.

**Soil Gas.** Potential safety and risk of upset impacts associated with methane-related hazards that would also apply to development under this alternative would be similar to those of the Proposed Project, which were found to be potentially significant; however, implementation of Project Design Features and other mitigation measures that would also apply to development under this alternative would reduce the impacts to a level that is less than significant. The results of the soil gas surveys completed in 1998 through 2001 found elevated levels of methane within shallow soils of the Project site. Such areas with elevated levels of methane are generally located in the southwest portion of the Project site (maximum concentration of 323,600 ppmv), although elevated levels of methane, ranging from approximately 13,000 ppmv to 44,400 ppmv, were detected in three other areas within the Proposed Project site. Only very low, if any, concentrations of hydrogen sulfide, benzene toluene, ethylbenzene, and xylenes (BTEX) were

detected within the area of the Proposed Project. The majority of samples were “non-detect” for hydrogen sulfide based on a detection with a limit of one part per billion and no BTEX was detected based on detection limits of 0.07 parts per billion by volume (ppbv). The maximum concentration detected for hydrogen sulfide and constituents of BTEX were 1.000 ppmv and 1.1 parts per million, respectively. These very low concentrations do not pose a significant health and safety risk. A comprehensive worker safety program specific to the potential for soil gases being encountered during grading and construction is proposed as a Project Design Feature, which is assumed to also apply to this alternative. With regard to methane-related safety/risk of upset impacts associated with long-term operation of the Proposed Project or this alternative, the application of a comprehensive methane management program as a Project Design Feature would serve to avoid significant impacts. The mitigation program would avoid significant health and safety impacts related to soil gas. Therefore, the impacts would be similar to those of the Proposed Project in areas to be developed, which were found to not be significant.

**Aviation Hazards.** Potential safety/risk of upset impacts associated with aviation hazards would be less than those of the Proposed Project, which were concluded to be less than significant. Operation of the two heliports currently permitted within the adjacent Playa Vista First Phase Project site could pose potential safety/risk of upset impacts on future development within the Proposed Project site. The heliport currently permitted within the Project site, as is the case with the Proposed Project, would not be developed. Heliport No. 1, located to the east of the Project site, poses a negligible risk, as its western flight path passes the area of the Proposed Project to the northeast and never crosses the site. Heliport No. 2, located just to the east of the easternmost lot of the Project site, would not pose a potential safety/risk of upset impact related to aviation safety, since all development under this alternative would likely be a maximum of two stories in height. No significant impacts are anticipated to occur because, in the unlikely event that the height of a new building in the Proposed Project extends into the subject air space and results in a conflict with operation of the heliport, the heliport is required to modify its flight path to eliminate the conflict or cease operations. Elimination or avoidance of such a conflict could be achieved if the heliport is relocated to a new suitable site or if the heliport is operated from the rooftop of a building. Overall, the potential for safety/risk of upset impacts pertaining to heliport operations would be substantially reduced relative to the Proposed Project, given the reduced building heights proposed under this alternative (i.e., only two-story buildings are anticipated to be constructed which would not interfere with flight paths).

#### **4.6.2.J Population, Housing and Employment**

Under this alternative, residential uses would be 75 percent less than under the Proposed Project, and office, retail and community-serving uses would be eliminated. A comparison of the resulting amounts of employment, housing and population, with those of the Proposed Project, are presented in Table 220 on page 1381. This alternative would result in a population gain of 1,430 persons, housed in 650 dwelling units. There would be no employment. Without a

Table 220

**ALTERNATIVE 6: POPULATION, HOUSING AND EMPLOYMENT****Housing and Population**

	<b>Dwelling Units</b>	<b>Average Household Size</b>	<b>Population</b>
Alternative 6	650	2.2	1,430
Proposed Project	<b>2,600</b>	<b>2.2</b>	<b>5,720</b>
<b>+/- Compared to the Proposed Project</b>	<b>-1950</b>		<b>-75%</b>

**Employees**

	<b>Office – Commercial Employment</b>						<b>Total Employment</b>
	<b>Office <sup>a</sup></b>		<b>Retail <sup>b</sup></b>		<b>Community-Serving <sup>c</sup></b>		
	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	<b>Quantity (SF)</b>	<b>Employment</b>	
Alternative 6	0	0	0	0	0	V	0
Proposed Project	175,000	700	150,000	400	40,000	80	1,180
<b>+/- Compared to the Proposed Project</b>							<b>-100%</b>

<sup>a</sup> Calculated by using a factor of 250 sq.ft. per employee.

<sup>b</sup> Calculated by using a factor of 375 sq.ft. per employee.

<sup>c</sup> Calculated by using a factor of 500 sq.ft. per employee.

Source: PCR Services Corporation.

mixed-use component, the Project's internal job-housing linkages would not occur. Further, with the reduction in housing this alternative would offer less benefit to the ratio job/housing ratio in the Local Area. (The Proposed Project would reduce the existing ratio in the local area from 2.66 to 2.43, whereas the alternative would only lower it to 2.59). The number of houses and related population would fall within the growth range anticipated for the sub-region in the Growth Management Plan.

**4.6.2.K Transportation****4.6.2.K.(1) Traffic and Circulation**

This alternative generates 3,809 daily trip ends, representing 84 percent fewer trips than the Proposed Project's 24,220 trips. During the morning and evening peak hours, this alternative generates 286 and 351 trips respectively. This contrasts with 1,626 trips and 2,302 trips for the Proposed Project for the respective peak hours. This represents 82 percent and 85 percent fewer trips than the Proposed Project in the morning and evening peak hours, respectively. Trip generation provides a general indication of impacts on CMP intersections, freeway links, and

public transit. Therefore, generally speaking, proportionate decreases would occur in each of these impact areas.

In order to provide a more detailed evaluation regarding traffic and circulation, an analysis of this alternative has been prepared to determine the number of trips generated and the impacts on roadway service levels at the 218 intersections analyzed in this EIR (see the Village at Playa Vista Traffic Report, Appendix K of this EIR). This analysis and its following summary are based on impacts prior to mitigation. Per this analysis, the alternative produces significant traffic impacts at no intersections in the A.M. and 2 intersections, approximately 1 percent of the analysis locations, in the P.M. peak hours, respectively, compared to 14 percent and 22 percent of the locations impacted by the Proposed Project during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a lesser degree than the Proposed Project. No significant differences in travel patterns outside the Project area would be expected between this alternative and the Proposed Project.

Analysis of the transportation system operating conditions in the future with the Project alternative reveals the following system performance characteristics in relation to those with the Proposed Project:

- The average volume capacity (V/C) ratio (or demand to capacity ratio) of the system would decrease to 0.835 and 0.869 during the A.M. and P.M. peak hours, respectively, compared to the average V/C ratio of 0.842 and 0.880 respectively, during the same peak hours for the Proposed Project.
- Approximately 83 and 104 of the 218 analyzed intersection locations are projected to operate at unacceptable levels of service (LOS E or F) during the A.M. and P.M. peak hours, respectively, compared to 90 and 108 locations operating at unacceptable LOS E or F with the Proposed Project.
- The above two operating conditions, however, should be viewed in light of the fact that the 2010 base conditions analysis reveals that the average system V/C ratio without the Project is projected to be 0.833 and 0.867 during the A.M. and P.M. peak hours, respectively. Further, the number of intersection locations in 2010 base conditions that are projected to be operating at an unacceptable LOS E or F would be 84 and 104 during the A.M. and P.M. peak hours, respectively. Therefore, relative to 2010 base conditions, this alternative results in 1 and 0 less LOS E or F locations during the A.M. and P.M. peak hours, respectively, as opposed to 6 and 4 more LOS E and F intersections with the Proposed Project during the same peak hours.

It is expected that implementation of this alternative would include a mitigation program to reduce potentially significant impacts. With fewer trips, this alternative would require a reduced traffic mitigation program.

#### **4.6.2.K.(2) Parking**

As with the Proposed Project, the parking needs for this alternative would be met through application of the standards and review procedures established in the Area D Specific Plan. This alternative would, like the Proposed Project result in the need for restricted parking along Centinela Avenue as would those of the Proposed Project. However, as with the Proposed Project, no significant parking impacts would occur.

#### **4.6.2.K.(3) Bicycle Plan**

Bikeways similar to those of the Proposed Project could be included in this alternative, and such impacts to the existing bikeway system would be beneficial and less than significant under both plans. The impacts would, on net, be similar under both alternatives.

#### **4.6.2.L Public Services**

##### **4.6.2.L.(1) Fire Protection**

Development occurring under this alternative would be served either through the current facilities and/or construction of the new station on a dedicated site within the adjacent Playa Vista First Phase Project. This alternative would generate a population of 1,430 residents and no employees. Based on the current service level of 53 emergency incidents per 1,000 residents and employees, approximately 76 emergency incidents would occur on an annual basis. This is 290 emergency incidents (79 percent) less than the 366 emergency incidents occurring under the Proposed Project. Therefore, the impacts on fire protection services would be less than under the Proposed Project. Potential revenues to pay for services would also be reduced proportionately.

##### **4.6.2.L.(2) Police Protection**

Development occurring under this alternative would be served through the same facilities as the Proposed Project. This alternative would result in a population increase of 1,430 residents and no employees. In order to maintain the LAPD Pacific Area current service level of 1.17 police officers per 1,000 residents and employees, approximately 2 police officers with associated equipment would be required to provide police protection and to maintain the existing service level. This is 6 officers less than the 8 officers required by the Proposed Project. Therefore, the impacts on police protection services would be less than under the Proposed

Project, but still significant. Potential revenues to pay for services would also be reduced proportionately.

#### **4.6.2.L.(3) Schools**

The alternative would generate a total of 139 public school students distributed as follows: 68 elementary students, 33 junior high school students and 38 high school students.<sup>612</sup> These amounts are less than those associated with the Proposed Project by 236, 113, and 129 students, respectively.

There is insufficient capacity to accommodate the students generated by this alternative at Playa del Rey Elementary School alone, without the availability of the Playa Vista Elementary School anticipated to be opened in the adjacent Playa Vista First Phase Project. With the availability of Playa Vista School there would be sufficient capacity. In comparison to the Proposed Project, the conditions described above are the same as those which occur with the Proposed Project. As such, insufficient capacity exists to accommodate all elementary school students generated by this alternative prior to the provision of new classrooms, as is the case with the Proposed Project. Notwithstanding, any impacts would be fully mitigated through the payment of fees to the school district (pursuant to SB 50). Nonetheless, the reduced student generation with this alternative would result in a less net impact after mitigation.

The 33 junior high school students generated by this alternative could be accommodated within Marina del Rey Middle School, the junior high school which serves the Project site. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Marina del Rey Middle School.

The 38 high school students generated by this alternative would attend Venice High School. The high school students that would be generated by this alternative would not exceed the forecasted unused capacity at Venice High School. Thus, this alternative, as is the case with the Proposed Project, would have a less-than-significant impact on Venice High School.

<sup>612</sup> *The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project. The residential factors are weighted averages of the factors for the unit types represented in Table 142 on page 1011 of the Schools Analysis, with the following factors:*

<i>Housing:</i>		<i>Employment:</i>	
<i>Elementary</i>	<i>0.105</i>	<i>Elementary</i>	<i>0.026</i>
<i>Junior High</i>	<i>0.050</i>	<i>Junior High</i>	<i>0.012</i>
<i>High School</i>	<i>0.059</i>	<i>High School</i>	<i>0.012</i>

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#### **4.6.2.L.(4) Parks and Recreation**

The 650 residential units proposed for development under Alternative 6, would generate a population increase of approximately 1,430 persons. The Alternative would include 2.9 acres of park space that would be equivalent to 2 acres per 1,000 residents. In addition this park space would be improved and maintained in a manner similar to that of the Proposed Project. The alternative would also include 1.0 acre of bikeways similar to those of the Proposed Project. Therefore, as was the case with the Proposed Project, this alternative would meet the PRP's short and intermediate range standards for community and neighborhood parks of 2 acres per 1,000 residents, plus offer the added benefit of improvements and maintenance. As with the Proposed Project, impacts would be less than significant. However, with less total park space, this Alternative would result in a lower increase in park service ratios in the area than would the Proposed Project.

#### **4.6.2.L.(5) Libraries**

The alternative would generate a population of 1,430 residents within the Library service area. This is 1,950 fewer residents than the population generated by the Proposed Project. Therefore, the impacts on library services, which were less than significant with the Proposed Project, would be proportionately reduced and less than significant with the alternative. Potential revenues to pay for services would also be reduced proportionately.

#### **4.6.2.M Energy Consumption**

Under this alternative, an estimated 30.922 MWh of electricity and 114.072 kcf of natural gas would be consumed on a daily basis, as shown in Table 221 on page 1386. This would represent approximately 81.1 percent less electricity and 76.5 percent less natural gas consumption than the Proposed Project. Both the alternative and the Proposed Project would create new sources of energy consumption, but the alternative's impact would be reduced. As with the Proposed Project, this alternative would have a less-than-significant impact on energy consumption.

#### **4.6.2.N Utilities**

##### **4.6.2.N.(1) Water Consumption**

Average daily potable water consumption under this alternative would be about 0.114 million gallons per day (mgd) as shown in Table 222 on page 1386 as compared to



Table 221

**ALTERNATIVE 6: ESTIMATED DAILY ENERGY CONSUMPTION**

Demand Source	Quantity (Units)	Electricity		Natural Gas	
		Factor <sup>a</sup>	Consumption (MWh)	Factor <sup>b</sup>	Consumption (kcf)
Residential	650 d.u.	5626.5 kWh/d.u./year	10.020	5338.0 cf/d.u./month	114.072
<b>Total Alternative 6</b>			<b>10.020</b>		<b>114.072</b>
<b>Total Proposed Project</b>			<b>53.007</b>		<b>484.728</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-81.1%</b>		<b>-76.5%</b>

*ksf = thousand square feet      d.u. = dwelling unit      kWh = kilowatt-hour      MWh = Megawatt-hour*  
*kcf = thousand cubic feet      sf = square feet      cf = cubic feet*

<sup>a</sup> *Electricity consumption factors based on Table A9-11-A of SCAQMD CEQA Air Quality Handbook (April 1993). Daily consumption was calculated using the annual factor divided by 365 days.*

<sup>b</sup> *Natural Gas consumption factors based on Table A9-12-A of SCAQMD CEQA Air Quality Handbook (April 1993) for monthly gas consumption. Daily consumption was calculated using monthly consumption factor multiplied by 12 and divided by 365 (~ 30.41 days/month).*

Source: Camp Dresser & McKee, Inc., 2003.

Table 222

**ALTERNATIVE 6: ESTIMATED DAILY POTABLE WATER CONSUMPTION**

Demand Source	Quantity (Units)	Factor <sup>a</sup>	Consumption (mgd)
Residential	650 d.u.	0.000176 mgd/d.u.	0.114
<b>Total Alternative 6</b>			<b>0.114</b>
<b>Total Proposed Project</b>			<b>0.503</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-77.3%</b>

*ksf = thousand square feet      d.u. = dwelling unit      mgd = million gallons per day*

<sup>a</sup> *Water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, wastewater generation factors. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses.*

Source: Camp Dresser & McKee, Inc., 2003.

0.503 mgd for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 6 would have less water consumption from residential, office, retail, and community-serving uses. Overall, Alternative 6 would generate 77.3 percent less potable water demand than the Proposed Project and therefore would have a reduced, less-than-significant impact. As summarized in Table 223 on page 1387, reclaimed water usage under Alternative 6 would be 0.009 mgd, which is 82.4 percent less than the 0.051 mgd of reclaimed water consumption associated with the Proposed Project.

Table 223

**ALTERNATIVE 6: ESTIMATED DAILY RECLAIMED WATER CONSUMPTION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor</b>	<b>Consumption (mgd)</b>
Office Cooling Towers	0.0 ksf	32 gpd/ksf <sup>a</sup>	0.000
Office Toilets	0.0 ksf	21 gpd/ksf <sup>a</sup>	0.000
Parks/Recreation Irrigation	2.5 acres	3,650 gpd/acre <sup>b</sup>	0.009
<b>Total Alternative 6</b>			<b>0.009</b>
<b>Total Proposed Project</b>			<b>0.051</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-82.4</b>

*ksf = thousand square feet gpd = gallons per day mgd = million gallons per day*

<sup>a</sup> *Reclaimed water consumption factors from City of L.A. Draft Citywide CEQA Thresholds Guide, based on 4 employees per 1,000 sq.ft. of office space*

<sup>b</sup> *Landscape irrigation demand factor from Camp Dresser & McKee Inc., "Conceptual Predesign of Water Reclamation and Solid Waste Processing Facilities," June 1990, updated June 1992.*

*Source: Camp Dresser & McKee, Inc., 2003.*

**4.6.2.N.(2) Wastewater**

Wastewater generation under this alternative would be about 0.104 mgd as shown in Table 224 on page 1388 as compared to 0.467 mgd for the Proposed Project. Based on the comparative difference in the nature and amount of land proposed, Alternative 6 would have less wastewater generation from residential, office, retail and community-serving uses. Overall, Alternative 6 would generate approximately 77.7 percent less wastewater than the Proposed Project, but both would have less-than-significant impacts on wastewater generation.

**4.6.2.N.(3) Solid Waste**

Solid waste generation under this alternative would be about 3.978 tpd, as shown in Table 225 on page 1388 as compared to about 18.917 tpd net for the Proposed Project. Based on the comparative differences in the nature and amount of land uses proposed, Alternative 6 would have less solid waste generation from residential and community-serving uses. Overall, this alternative would generate 79.0 percent less solid waste generation compared to the Proposed Project. However, this alternative would have a significant impact on solid waste generation, similar to that of the Proposed Project.

Table 224

**ALTERNATIVE 6: ESTIMATED DAILY WASTEWATER GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (mgd)</b>
Residential	650 d.u.	0.000160 mgd/d.u.	0.104
<b>Total Alternative 6</b>			<b>0.104</b>
<b>Total Proposed Project</b>			<b>0.467</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-77.7%</b>

*ksf = thousand square feet d.u. = dwelling unit mgd = million gallons per day*

<sup>a</sup> *Wastewater generation factors from City of L.A. Draft Citywide CEQA Technical Guide. Wastewater generation factors are equal to 90 percent of water consumption factors, to account for surface infiltration and evaporation losses. Wastewater generation factors are comparable to those for potable water consumption (90 percent of those for water for all factors), with the exception of office uses, where reclaimed water is used for cooling towers and toilets, yielding a factor of 203 gpd/ksf or gpd/du.*

*Source: Camp Dresser & McKee, Inc., 2003.*

Table 225

**ALTERNATIVE 6: ESTIMATED DAILY SOLID WASTE GENERATION**

<b>Demand Source</b>	<b>Quantity (Units)</b>	<b>Factor <sup>a</sup></b>	<b>Generation (tpd)<sup>b</sup></b>
Residential	650 d.u.	0.00612 tpd/d.u.	3.978
<b>Total Alternative 6</b>			<b>3.978</b>
<b>Total Proposed Project</b>			<b>18.917</b>
<b>% +/- Compared to the Proposed Project</b>			<b>-79.0%</b>

*ksf = thousand square feet d.u. = dwelling unit tpd = tons per day*

<sup>a</sup> *Solid waste generation factors based on the California Integrated Waste Management Board website, Waste Characterization database ([www.ciwmb.ca.gov/WasteChar/WasteGenRates](http://www.ciwmb.ca.gov/WasteChar/WasteGenRates)), November 2001.*

<sup>b</sup> *Solid waste generation presented in this table is prior to waste diversion, which would substantially reduce the amount of this waste requiring landfill disposal.*

*Source: Camp Dresser & McKee, Inc., 2003.*

**4.6.2.O Visual Qualities (Aesthetics and Views)**

**Aesthetics.** This alternative would cover the same general ground area as the Proposed Project, but the total building massing would be reduced with a lower, less intensive appearance. As with the Proposed Project the general more noticeable effects of development from ground level view locations would be dominated by landscaping treatments, and lower portions of

buildings. These buildings would be somewhat different than surrounding buildings but would not substantially contrast with those buildings. This alternative, like the Proposed Project, would result in the loss of undeveloped area, and related visual relief from the urban setting. Therefore, this alternative would also have a significant impact on aesthetics. However, the significant impact would be reduced a bit, with less development massing overall.

**Views.** From nearby, lower elevations along Jefferson Boulevard, view impacts under this alternative would be similar to those of the Proposed Project. The existing view of the bluffs would be lost, and a significant impact would occur. From atop the bluffs and more distant, higher elevations, the overall development form would be lower, causing a lesser affect on changes in the existing views. Buildings in the near view would be less noticeable, and nearer buildings in the mid-range view would still be apparent.

#### **4.6.2.P Cultural Resources**

##### **4.6.2.P.(1) Paleontological Resources**

Construction related activities, such as grading and excavation, could result in direct impacts on paleontological resources by covering or destroying fossiliferous rock units or exposing fossil bearing rock units to unauthorized collecting. At the same time, discovery of artifacts could occur with mitigation that would not otherwise occur. The amount of disturbed ground cover with this alternative would be roughly equivalent to that of the Proposed Project, although the amount of excavation would be reduced. The potential adverse and beneficial impacts would off-set, and on net, impacts would be similar to the Proposed Project.

##### **4.6.2.P.(2) Archaeological Resources**

Construction related activities could disturb, destroy, or remove archaeological sites or artifacts and expose such resources to theft and vandalism. At the same time, collection, study and archiving of such artifacts could result from mitigation measures that would be implemented with a development program. The amount of ground cover with this alternative would be roughly equivalent to that of the Proposed Project, although the amount of excavation would be reduced. Impacts would be similar to the Proposed Project.

##### **4.6.2.P.(3) Historical Resources**

As with the Proposed Project, the existing structures located on the southern portion of the site would be demolished. However, these structures are not considered historic resources. Therefore, as with the Proposed Project, there would be no impacts on historic resources.

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### **4.6.3 SUMMARY OF COMPARATIVE IMPACTS**

A summary of the comparative impacts between this alternative and the Proposed Project is presented in Table 226 on pages 1391 through 1394. This alternative would reduce but not eliminate the Proposed Project's significant impacts on traffic, regional air quality, construction noise, police service and solid waste disposal. It would not eliminate the significant aesthetic/view impact along Jefferson Boulevard adjacent to the Project site. Alternative 6 would also reduce the Proposed Project's non-significant impact levels on local air quality and noise from operations, other public services (with less revenue generation), safety/risk of upset, earth resources (grading, dewatering/subsidence, and seismic hazards), energy, and utilities. There would be reductions in total housing capacity, and employment.

### **4.6.4 RELATIONSHIP OF THIS ALTERNATIVE TO PROJECT OBJECTIVES**

This alternative would not meet most of the Proposed Project's basic objectives. It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing and recreational activities of a substantial scale and magnitude. Furthermore, this alternative while helping to meet the supply of market housing and City's need for housing Citywide and in the Westside, in particular, would do so at a level that is not substantial in nature as identified in the Project's basic objectives. In addition, the substantial reduction in units would preclude the objective of providing housing within a wide price range. Notwithstanding, the alternative would meet the Project's basic objective pertaining to resource protection and conservation.

Table 226

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 6 (75% REDUCED RESIDENTIAL, NO OFFICE, RETAIL, OR COMMUNITY-SERVING) TO THE PROPOSED PROJECT\***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Beneficial	Beneficial	Similar/Better	Stabilization of bluffs, flood control improvements, but less grading volume.
Dewatering/Subsidence	No Impact	No Impact	Similar/Better	Dewatering may become necessary for excavation, though the volume of dewatering would be substantially reduced given building heights.
Seismic Hazards	Non-Significant	Non-Significant	Similar/Better	Construction to same code/Fewer people and structures exposed to risk.
Slope Stability	Non-Significant	Non-Significant	Similar	Similar area of development near bluffs as Proposed Project.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Better	Less construction due to residential uses only at 75 percent reduction.
Construction/Local Emissions	Non-Significant	Non-Significant	Better	Less construction due to residential uses only at 75 percent reduction.
Operations/Regional Emissions	Significant	Significant	Better	Less traffic and energy consumption due to residential uses only at 75 percent reduction, 84 percent fewer trips.
Operations/Local Emissions	Non-Significant	Non-Significant	Better	Less traffic and energy consumption due residential uses only at 75 percent reduction, 84 percent fewer trips.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Similar surface disturbance and addition of impervious surfaces, and overall similar runoff rates and stormwater facilities.
Groundwater	Non-Significant	Non-Significant	Similar	Similar surface disturbance and addition of impervious surfaces, and recharge rates would not vary substantially.
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Similar potential with implementation of SWPPP and BMPs for both.
Groundwater	Non-Significant	Non-Significant	Similar	Similar potential and subject to the same regulations.
<b>Biotic Resources</b>				
Plant Life	Beneficial	Beneficial	Better	Reductions in indirect impacts; similar habitat restoration plan.
Animal Life	Beneficial	Beneficial	Better	Reductions in indirect impacts; similar habitat restoration plan.

Table 226 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 6 (75% REDUCED RESIDENTIAL, NO OFFICE, RETAIL OR COMMUNITY-SERVING) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Noise</b>				
Construction	Significant	Significant	Better	Shorter duration of construction.
Stationary	Non-Significant	Non-Significant	Better	Fewer stationary sources due to reduction in land use intensity.
Mobile	Non-Significant	Non-Significant	Better	84 percent fewer daily trips.
<b>Light and Glare</b>				
Natural Light – Shading	Non-Significant	Non-Significant	Better	Maximum effects would be less due to lower building heights.
Artificial Light and Glare	Non-Significant	Non-Significant	Similar	Less building lighting, but essentially similar nighttime appearance.
<b>Land Use</b>				
Regulatory	Non-Significant	Non-Significant	Similar	Would require similar amendments to the District and Specific Plans.
Land Use Pattern	Non-Significant	Non-Significant	Worse	Residential development only. Would not offer internal benefits of mixed-use development.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Similar	No mineral resources are present on the Project site.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Similar/Better	Same areas to be developed, but less residential population exposed to potential safety/risk of upset hazards and less excavation which could expose contamination.
<b>Population, Housing and Employment</b>				
Population	Non-Significant	Non-Significant	Similar	Lower population levels than the Proposed Project.
Housing	Beneficial	Beneficial	Worse	75 percent less housing stock than the Proposed Project.
Employment	Beneficial	Beneficial	Worse	100 percent less employment opportunity than the Proposed Project.
Jobs/House Bal.	Non-Significant	Non-Significant	Worse	No internal benefits, less contribution to reduction of the jobs/housing ratio at the Local Area.

Table 226 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 6 (75% REDUCED RESIDENTIAL, NO OFFICE, RETAIL OR COMMUNITY-SERVING) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Transportation</b>				
Traffic and Circulation	Significant	Significant	Better	84 percent fewer trips, with proportional decreases likely to occur on CMP intersections, freeway links, and public transit.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated
Bicycle Plan	Beneficial	Beneficial	Similar	Similar bikeway improvements could be provided.
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Police Protection	Significant	Significant	Better	Less demand, with proportionally less revenue.
Schools	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
Parks and Recreation	Non-Significant	Non-Significant	Worse	Similar on-site park ratio, but with less total park space, and less increase in the community park service ratio.
Libraries	Non-Significant	Non-Significant	Better	Less demand, with proportionally less revenue.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Better	81.1 percent less electricity and 76.5 percent less natural gas consumption.
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Better	77.3 percent less daily potable water consumption and 82.4 percent less reclaimed water consumption.
Wastewater	Non-Significant	Non-Significant	Better	77.7 percent less daily wastewater generation.
Solid Waste	Significant	Significant	Better	79.0 percent less daily solid waste generation. Nonetheless, any exacerbation in demand is considered significant.



Table 226 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 6 (75% REDUCED RESIDENTIAL, NO OFFICE, RETAIL OR COMMUNITY-SERVING) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Visual Quality (Aesthetics and Views)</b>				
Aesthetics	Significant	Significant	Better	Lower buildings and less dense development. Loss of undeveloped area would be similar.
Views	Significant	Significant	Better	Development confined to lower building heights. Significant impacts on Bluff views for travelers along Jefferson Boulevard would be similar.
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Similar	Generally similar area disturbed; less excavation with similar research mitigation.
Archaeological Resources	Non-Significant	Non-Significant	Similar	Generally similar area disturbed; less excavation with similar research mitigation.
Historical Resources	No Impact	Non-Significant	Similar	In both cases, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts prior to mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## **4.7 ALTERNATIVE 7: DESIGNATED ALTERNATIVE SITE**

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### **4.7.1 GENERAL APPROACH**

This analysis considered the potential impacts that would occur if the Proposed Project were to be located at an Alternative Site. For the purposes of the alternative site analysis, it is assumed that only the Project's urban development program would be developed at an alternative site. However, the Proposed Project's Habitat Creation/Restoration component was not included in the identification of alternative sites because the riparian corridor and the bluff restoration are specific to the Playa Vista setting. These elements account for about 11.7 acres of the Proposed Project site. Thus, a site of 99.3 acres of land (approximately 100 acres) was the focus of the alternative sites analysis.

### **4.7.2 IDENTIFICATION AND SELECTION OF THE ALTERNATIVE SITE**

The search for alternative sites focused on those sites that had the potential for relocating the development to serve future growth within the same general region as the Proposed Project. Sites within the City of Los Angeles that met the selection criteria were limited, so the survey area was extended to cover all of Los Angeles County, excluding the Antelope Valley/high desert and mountainous areas. Discussions were held with county and local planning staffs regarding potential sites. Aerial photographs were reviewed for contiguous areas of 100 acres or more that were undeveloped or sparsely developed. Most of these sites were existing public facilities, such as airports or golf courses that would be unlikely to be available for private uses, so all sites in current public use were deleted from further consideration. Other excluded sites were in multiple ownership and, therefore, probably could not be assembled into the desired site size.

Sites which are proposed and/or planned for other development, but still vacant, were not excluded from consideration, since this would make it difficult for any site to qualify for further analysis. However, the implications of existing site plans and their potential constraints regarding the relocation of the Proposed Project were considered in the selection of the most appropriate alternative site.

Potential alternative sites were extremely difficult to identify as the region is substantially developed, with few remaining sites that are greater than 100 acres in size and that are available for development. As such sites are rare, they are typically the focus of other development interests, with varying commitments for future use and development. Furthermore, the ability to

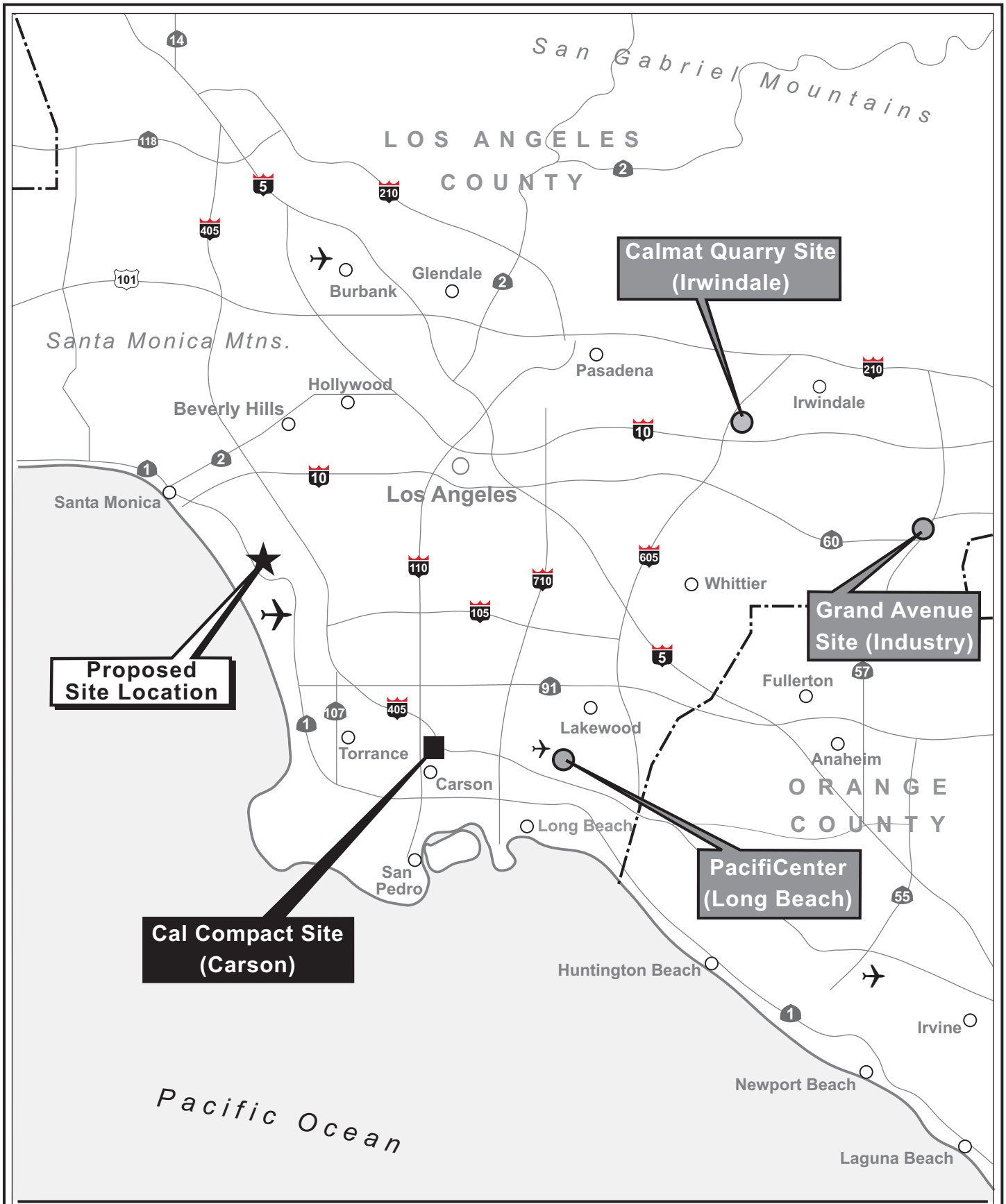
acquire any such sites is extremely speculative. Nonetheless, several sites were considered as a potential alternative site, and one of these sites was selected for further analysis in order to provide a comparative profile of impacts at an alternative location. Sites that were considered and rejected are shown in Figure 110 on page 1397 and include: (1) the Calmat Quarry Site, a currently operating quarry site in the City of Irwindale; (2) the Grand Avenue site, a site currently slated for light-industrial development in the City of Industry; and (3) the PacificCenter site, an existing industrial/aviation-related site proposed for redevelopment in the City of Long Beach.

The site selected for the alternative site analysis is the Cal Compact site in the City of Carson, which is also shown in Figure 110. This site was selected for analysis as the preferred alternative site for the following reasons: (1) the site is located within western Los Angeles County approximately 20 miles from the Proposed Project site (it is the closest of the sites considered); (2) the site would qualify as an urban in-fill development; (3) the site is located in proximity to both the San Diego and Harbor Freeways; and (4) while the site is the focus of interest for other development projects, it does not have a higher level of commitment to redevelopment than the other potential sites considered.

The Cal Compact site is a 157-acre site located immediately south of the junction of the San Diego and Harbor Freeways. The location and boundaries of the Alternative Site are illustrated in Figure 111 on page 1398. Surrounding land uses include the Dominguez Golf Course to the north, retail uses at the South Bay Pavilion at Carson east of the San Diego Freeway, and a car dealership, mobile home parks and single-family dwellings to the south and west.

The site was operated as a Class II municipal landfill from 1959 to 1965 and is currently vacant. At the time landfill operations were ceased, the landfill was covered with a final layer of soil that varies in thickness from three to 60 feet, with an average depth of 10 feet. In order to develop the Alternative Site with a mixed-use development, cleanup of the landfill would be required under the authority of the State of California Department of Toxic Substances Control.

Although there are no known development constraints on the Alternative Site that would preclude the use of all 157 acres, for the purpose of this analysis, it is assumed that development would be limited to a size similar to the Proposed Project. It is assumed that approximately 100 acres would be used for urban development (inclusive of park space) and approximately 11 acres would be used for passive open space. Such passive open space would serve as a buffer space between adjacent users. The remaining 46 acres would remain available for other development. The open space could be used as a buffer between the development and adjacent residential uses. The urban development program at the Alternative site would be the same as those set forth for the Proposed Project.



- Selected Site
- Considered but not Selected

**Figure 110**  
**Location of**  
**Alternative Sites**

Source: PCR Services Corporation, March 2003

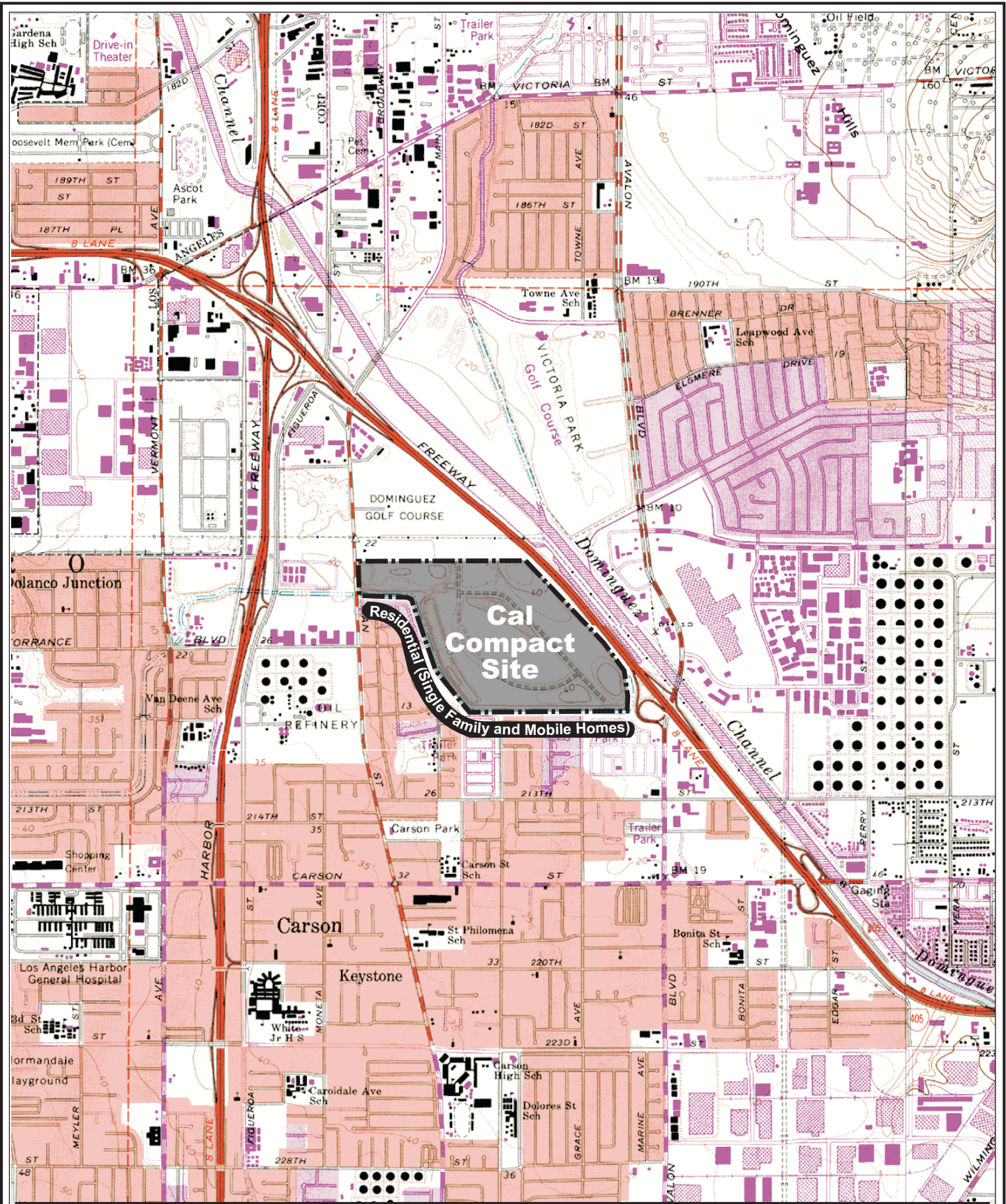


Figure 111  
 Alternative Site:  
 Cal Compact Site

Source: USGS Quadrangle, 1964 (photo revised 1981)



For each environmental issue area, a comparative determination is made as to whether the overall mitigated adverse environmental impacts of this alternative would be better, similar, or worse than the corresponding impacts associated with the Project site. A summary of comparative adverse impacts is presented at the end of this analysis in Table 228 on pages 1419 through 1422. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.

### **4.7.3 ANALYSIS**

#### **4.7.3.A Earth**

Impacts to earth resources include grading (excavation/fill and erosion/sedimentation), dewatering, subsidence, seismic hazards (groundshaking and rupture, tsunami and seiche, liquefaction, and lurching), and slope stability.

##### **Grading**

Due to the topography of the site, and the variation in soil characteristics, grading would be required to achieve necessary building pad elevations at the Cal Compact site. It is anticipated that the grading of the site would require large quantities of imported fill material that meets proper engineering standards for compaction and shear strength. Given that the Playa Vista site is relatively flat and is not located on a former landfill, it is anticipated that grading impacts associated with the Cal Compact site would be greater than those of the Playa Vista site; however, the comparatively greater amount of grading activities would not result in significant earth resources impacts.

##### **Dewatering/Subsidence**

Because site preparation would generally require import of fill materials and the depth to groundwater at the Cal Compact site ranges from 52.5 to 70.0 feet below ground surface, it is not expected that extensive, if any, dewatering would be necessary. As such, no significant dewatering impacts are anticipated to occur. The site is located on a former Class II landfill, which is composed of four distinct “waste zones” (i.e., four individual areas in which landfill operations successively occurred at the site). Development on these zones could result in subsidence impacts, due to the differentiated materials within the waste zones and the variation in the compaction of wastes. However, as part of the grading/site preparation activities, imported and on-site suitable fill material would be applied where necessary such as to minimize the potential for unstable soil conditions (i.e., subsidence). With the implementation of

appropriate geotechnical engineering design measures, no significant impacts related to subsidence would occur. Dewatering and subsidence impacts associated with this alternative would be better than what is anticipated to occur at the Playa Vista site.

### **Seismic Hazards**

No known active or potentially active faults underlie the site, and risks associated with seismic activity are similar to those experienced throughout the Southern California region. Significant ground shaking could occur at the site, but the potential for ground rupture is considered remote. Development at the Cal Compact site would be subject to the same building and seismic codes as that of the Playa Vista site, which would minimize impacts to local workers and residents.

Impacts from tsunamis and seiches are not expected to occur, due to the distance from the coast and the lack of large water bodies in proximity to the site.

Due to the soil conditions in the Lakewood Formation that underlies the site, which is composed of fine granular soils that are generally medium-dense to dense, and the depth of the groundwater levels (i.e., 52.5 to 70.0 feet below ground surface), the potential for liquefaction is low. Because the risk of liquefaction is low, the risk of lateral spreading caused by earthquakes would also be low. Densification and settlement of the granular soils above the groundwater level due to earthquake shaking would be unlikely due to the existing density of the soils. Differential compaction or densification of the waste zone and landfill cover beneath the project site is not anticipated due to the composition of the waste zone and the dynamic compaction of roadways and building footprints to be implemented as part of developing the Cal Compact site.

Impacts from ground lurching (i.e., the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of seismic activity, forming irregular ground surface cracks) would not occur at the Alternative Site, as there are no landforms on-site that could become unstable (or “lurch”) during a seismic event, which could result in adverse impacts to people or structures. Impacts from seismic hazards would be less than significant and thus would be better at the Cal Compact site than at the Playa Vista site.

### **Slope Stability**

As discussed above, unstable slope conditions (i.e., lateral spreading) of the gentle slopes on the Cal Compact site are not anticipated to occur. No slopes exist on-site with the potential for failure or impacts to people or structures, and no slope stabilization or bluff restoration would occur. No impacts related to slope stability would occur, and impacts would be better than at the Playa Vista site.

### **4.7.3.B Air Quality**

The amount of grading and fill required at the Cal Compact site would be greater than what is anticipated to occur at the Playa Vista site. Therefore, regional construction emissions would be greater compared to the Proposed Project and would likewise be significant for criteria pollutants. Sensitive receptors occur adjacent to the Cal Compact site. They include a mobile home park near Avalon Boulevard and the I-405, single-family units and mobile park residences south of the site, and a single-family home on Main Street. Local emissions dispersion would be similar to the Proposed Project as the amount of daily activity would be similar, and likely would not be significant.

The number of daily trips generated by this alternative would be the same as the Proposed Project, resulting in similar increases in mobile air quality impacts. The total contributions to regional emissions under this alternative would be significant, as was the case with the Proposed Project. The increase in traffic associated with this alternative would contribute to a proportionate increase in localized emissions of carbon monoxide similar to the Proposed Project. However, such emissions were below the significance threshold for localized carbon monoxide for the Proposed Project. Applying the incremental increase in carbon monoxide concentrations attributable to the Proposed Project to locations around the Cal Compact site would likely result in less-than-significant localized air quality impacts at these locations as well.

### **4.7.3.C Water Resources**

#### **4.7.3.C.(1) Hydrology**

##### **Surface Water**

The site topography of the Cal Compact site varies, with elevations ranging from 14.5 to 53.9 feet above mean sea level. Most of the ground surface consists of a large, unpaved expanse of exposed soil. The amount of vegetation available to anchor the surface soil is minimal. The principal mechanism of water and sediment transport on- and off-site is via surface runoff during and immediately following rain events. Introduction of impervious surfaces to the Cal Compact site would increase surface water runoff volumes that would drain to nearby stormwater conveyance facilities. This alternative would incorporate storm drain and surface runoff control infrastructure, similar to the Proposed Project, in order to minimize or avoid surface water hydrology impacts. Like the Proposed Project, all storm drain infrastructure improvements would be designed to accommodate a 50-year design storm. No significant surface water hydrology impacts would occur at the Alternative site, and, therefore, impacts would be similar to those of the Proposed Project.



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## **Groundwater**

The Bellflower Aquitard, the Gage Aquifer, and the Lynwood and Silverado Aquifers exist beneath the Cal Compact site. The Bellflower Aquitard extends from near ground surface to approximately 100 feet below ground surface and has relatively low permeability. The Gage Aquifer is located at the base of the Lakewood Formation and can range up to approximately 200 feet in thickness. The Lynwood and Silverado Aquifers occur within the San Pedro Formation below the Gage Aquifer, and are a source of drinking water. Development under this alternative would cover much of the site with impermeable surfaces, thus reducing the amount of groundwater recharge that currently occurs at the site. Depth to groundwater at the Cal Compact site is considerably deeper than at the Playa Vista site, and development of this alternative would include construction of a surface cover that would prevent surface water percolation in landscaped areas. Development of structures would preclude surface water percolation at other on-site non-landscaped areas. Impacts to groundwater hydrology would be less than significant and similar to those of the Proposed Project.

### **4.7.3.C.(2) Water Quality**

#### **Surface Water**

Implementation of this alternative would cover currently exposed soils on-site with a similar amount of impermeable surfaces and landscaping vegetation as the Proposed Project, which would serve to increase runoff velocities and reduce potential for soil erosion and sedimentation. Similar to the Proposed Project, this alternative would incorporate a Stormwater Pollution Prevention Plan (SWPPP), stormwater runoff infrastructure, and Best Management Practices (BMPs), as appropriate, which would minimize the potential for adverse surface water quality impacts during construction and operation of the on-site uses. Impacts to surface water quality under this alternative would be less than significant and would be similar to those of the Proposed Project.

#### **Groundwater**

Groundwater beneath the Cal Compact site has been contaminated by leaching of wastes from former landfill operations, including VOCs, SVOCs, and metals. As part of this alternative, groundwater collection and treatment would be implemented to remediate existing groundwater contamination to the extent feasible, in accordance with all applicable requirements of the RWQCB. This alternative is not expected to result in significant groundwater quality impacts, and impacts would be similar to the Proposed Project.

#### **4.7.3.D Biotic Resources**

Site conditions present at the Cal Compact site are similar to conditions present at the Playa Vista site. Long-term human disturbances present at this alternative site have significantly altered the native on-site flora and have reduced faunal diversity and abundance. The majority of plant species present consists of species normally associated with disturbed conditions and maintain a high percentage of introduced, ornamental and invasive plants. A review of the California Natural Diversity Data Base and other pertinent literature sources indicate that no special status species of plants or animals are known to significantly utilize habitat on the Cal Compact site. Further, no special status habitats (inclusive of wetlands) are known to be present.

The Cal Compact site is situated in an urban area. No large areas of natural open space occur adjacent to the site or are present in the project vicinity. As such, wildlife movement is restricted to the site. The Alternative Site is also not integral to any large-scale wildlife movement pattern.

When compared to the Proposed Project, direct impacts to biological resources under this alternative are expected to be similar. Short- and long-term direct impacts on biological resources would occur with project construction and operation. Development would result in the loss of vegetation and habitat present on the Alternative Site. Similar to the Proposed Project, the habitat present does provide value to a number of common plants and animals that have adapted to a disturbed condition with a substantial persistent human presence. Habitat for these common species would be replaced with areas of urban development or developed open space areas that would provide some low value habitat. Similar to the Proposed Project, direct impacts would not affect any special status species or habitat(s) inclusive of wetlands.

Because the Cal Compact site is located in a geographic region surrounded by urbanization or areas of active open space, indirect impacts associated with this alternative would be reduced when compared with the Proposed Project. Natural open space areas occur adjacent to the Playa Vista site and potential indirect impacts require mitigation. Indirect impacts associated with increased population of non-native plants and animals, light and glare and noise would not significantly effect areas adjacent to the site that are not used by substantial populations of native wildlife or special status species that are not adapted to conditions associated with a substantial human presence.

#### **4.7.3.E Noise**

Noise conditions present at the Cal Compact site are similar to those at the Playa Vista site. Relatively low noise levels occur in the interior of the Cal Compact site away from existing noise sources. However, adjacent to the site, vehicular noise (i.e., motor vehicle travel on the

I-405 and Avalon Boulevard) and other urban noise sources result in relatively high noise levels. Sensitive noise receptors occur in the vicinity of the Cal Compact site and include a mobile home park near Avalon Boulevard and the I-405, single-family units and mobile home park residences south of the site, and a single-family home on Main Street.

Construction noise at the Cal Compact site would be similar to construction noise expected at the Playa Vista site. Site preparation at either location would involve the use of mechanical equipment required in association with grading, installation of the required infrastructure and construction of the buildings. It is expected that this could result in noise events at or exceeding 85 dBA at the nearest sensitive receptor. Construction noise would be of short-term duration and mitigation measures are planned to reduce both the timing and duration of this noise. However, construction noise would be significant and would be comparable to the Proposed Project.

Operational noise impacts from this alternative would be similar to the operations noise impacts expected as part of the Proposed Project, although sensitive noise receptors occur more proximal to the site. Traffic-related noise associated with project operation has the potential to significantly increase noise levels in areas proximal to sensitive receptors that occur near the Cal Compact site. No mitigation measures are readily available that would reduce vehicular noise to a level consistent with adopted standards. Impacts would be similar to those of the Proposed Project.

#### **4.7.3.F Light and Glare**

##### **4.7.3.F.(1) Natural Light – Shading**

The amount of shading resulting from the development of this alternative would be similar to the Proposed Project. However, this alternative would impact a greater number of sensitive land uses than the Proposed Project due to the proximity of residential land uses to the south and west of the alternative site. By utilizing design standards similar to that of the Proposed Project, development of the alternative site could avoid shading of adjacent sensitive uses and impacts could be less than significant.

##### **4.7.3.F.(2) Artificial Light and Glare**

The amount of light and glare generated from the development of this alternative would be similar to the Proposed Project. However, this alternative would impact a greater number of sensitive land uses than the Proposed Project due to the proximity of residential land uses to the south and west of the alternative site. Lighting and glare reflecting materials would be controlled in a manner similar to that of the Proposed Project, and would not be significant.

### 4.7.3.G Land Use

Similar to the Playa Vista site, the Cal Compact site is currently designated for Regional Commercial and Light Industrial uses by the City of Carson General Plan and the Redevelopment Plan for the City of Carson Redevelopment Project Area No. 1. Implementation of this alternative would result in the development of a more locally, neighborhood-oriented, mixed-use development. Similar to the Proposed Project, the alteration of use under this alternative would require a Plan amendment, but would not necessarily result in an adverse environmental effect.

Development of the Cal Compact site under this alternative would not divide an existing community. The site is currently a large vacant parcel bounded by a golf course to the north and the San Diego Freeway to the east, which effectively separates the existing residential uses to the south and west from other uses to the north and east under current conditions.

### 4.7.3.H Mineral Resources

The site is not in a Mineral Resource Zone area and no mineral resources, including sand, gravel, and petroleum resources, exist on or beneath the Cal Compact site. The impacts on mineral resources would be similar to those of the Proposed Project; hence no significant impacts are expected on mineral resources.

### 4.7.3.I Safety/Risk of Upset

**Hazardous Materials Management.** As with the Proposed Project, no routine handling, disposal, or transport of hazardous materials is proposed as part of this alternative. The site is currently vacant; hence there would be no asbestos abatement necessary. However, generally the hazardous materials management at the alternative site is similar to the Proposed Project. As such, no significant impacts are expected relative to hazardous materials management.

**Soil/Groundwater Contamination.** On-site historic landfill operations at the Cal Compact site have resulted in the contamination of surface soils, soils in the waste zone, and groundwater. The presence of VOCs, SVOCs, and metals in the soil cover, waste zone, and groundwater confirms that the solid waste buried beneath the site is the source of the contamination. Such contaminants have the potential to affect the health of residents and workers on-site if this alternative were implemented. This alternative would incorporate measures and design features to remediate or contain existing contamination and to prevent further contamination, as required by the Regional Water Quality Control Board and Department of Toxic Substances Control, in order to protect the health of the on-site population at buildout. With implementation of design features, as well as measures to remediate contamination,

impacts relative to soil and groundwater contamination would be less than significant and would be similar to those of the Proposed Project.

### **Soil Gas**

Soil gas (e.g., methane, VOCs, and BTEX) originating from the decomposition of buried wastes in the former Cal Compact landfill could have the potential to affect residents on-site if not properly mitigated. However, ambient air sampling at the surface of the landfill (i.e., Cal Compact site) showed that concentrations of VOCs were no greater than those found in the air throughout the region. Soil gas safety systems could be implemented, as required to avoid a significant risk to life or health. As such, no significant soil gas impacts are anticipated. Soil gas impacts from development of this alternative would be similar to those of the Proposed Project.

### **Aviation Hazards**

The Goodyear blimp landing pad site is located about a mile north of the Alternative Project site across the San Diego Freeway (I-405). Blimp operations are not expected to affect, or be affected by, implementation of this alternative. Therefore, it is not anticipated that impacts associated with aviation hazards would occur; therefore, impacts related to aviation hazards would be similar to the Proposed Project under this alternative.

#### **4.7.3.J Population, Housing and Employment**

This alternative would provide the same number of jobs and housing as the Proposed Project. It is also assumed that this alternative would result in a similar increase in population.

The Project's 0.45 jobs/housing ratio (housing rich) would provide a benefit to the jobs rich area in which the Alternative site is located. According to the City of Carson General Plan Housing Element, there are currently 25,337 housing units in the City compared to a total employment of 40,590 jobs for a jobs/housing ratio of approximately 1.66.<sup>613</sup> In comparison, as discussed in Section IV.J of this Draft EIR, the Local Area for the Playa Vista Site has a jobs/housing ratio of approximately 2.66. Thus, Proposed Project area has a greater need for housing-rich development.

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<sup>613</sup> *City of Carson, City of Carson General Plan, Housing Element, July 2002.*

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### **4.7.3.K Transportation**

#### **4.7.3.K.(1) Traffic and Circulation**

Traffic impacts at the Cal Compact site would be similar to the Playa Vista site. In order to evaluate the traffic impact of this alternative, a traffic study was conducted by Kaku Associates. Table 227 on page 1408 provides a summary of the street and freeway segments and corresponding level of service (LOS). This analysis is based on impacts prior to mitigation. Based on the Los Angeles Department of Transportation's (LADOT) threshold of significance (where an increment of 0.04 or more is significant at LOS C; 0.02 is significant at LOS D; and 0.01 is significant at LOS E or F), this alternative's unmitigated project traffic would cause significant adverse A.M. peak hour traffic impacts at 26 of the locations studied and adverse P.M. peak hour traffic impacts at 31 of 68 locations studied. The Proposed Project's unmitigated A.M. traffic impacts occur at 31 of 218 locations or 14 percent of the analyzed locations. The Project's P.M. peak hour impacts occur at 47 of 218 locations or 22 percent of the analyzed locations. Given the high number of impacted intersections, it may be concluded that this alternative would have substantial impacts that would not necessarily be preferable to impacts incurred at the Playa Vista site. Similar mitigation measures to those of the Proposed Project would be required.

#### **4.7.3.K.(2) Parking**

This alternative would generate demand for parking that could be fully mitigated by provision of on-site parking in accordance with applicable codes and regulations, or via a demand analysis at the discretion of the City of Carson. As with the Proposed Project, no significant parking impacts would arise. This alternative may result in the loss of some on-street parking due to off-site mitigation measures, similar to the Proposed Project.

#### **4.7.3.K.(3) Bicycle Plan**

Although an internal bikeway system would likely be developed at the Cal Compact site, this system would not be integrated with any existing bikeway plans and would not link to an existing bikeway system. The integrated bikeway system of the Proposed Project enhances the system anticipated in the existing plans, and would be of greater benefit. Although this alternative would create additional demand for bikeways and would not provide as great of a benefit as the Proposed Project, impacts would be less than significant.

Table 227

SUMMARY OF LEVEL OF SERVICE – ALTERNATIVE SITE ANALYSIS

Street	From	To	A.M. Peak-Hour Analysis									P.M. Peak-Hour Analysis							
			EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT			EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT					
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	IMPACT	V/C	LOS	V/C	LOS	V/C	LOS	V/C	IMPACT	
<b>STREET SEGMENTS</b>																			
Figueroa St	I-405 SB Ramp	Del Amo Blvd	NB	0.524	A	0.448	A	0.458	A	0.009	N	0.255	A	0.399	A	0.408	A	0.009	N
			SB	0.449	A	0.470	A	0.475	A	0.005	N	0.772	C	0.698	B	0.709	C	0.011	N
Figueroa St	Torrance Blvd	Carson St	NB	0.433	A	0.742	C	0.745	C	0.003	N	0.275	A	0.465	A	0.471	A	0.006	N
			SB	0.131	A	0.211	A	0.215	A	0.005	N	0.232	A	0.680	B	0.685	B	0.005	N
Figueroa St	Carson St	220 St Ramps	NB	0.511	A	0.480	A	0.482	A	0.003	N	0.403	A	0.438	A	0.443	A	0.006	N
			SB	0.127	A	0.158	A	0.163	A	0.005	N	0.190	A	0.321	A	0.326	A	0.005	N
Main St	I-405 SB Ramp	Del Amo Blvd	NB	0.487	A	0.557	A	0.571	A	0.014	N	0.455	A	0.614	B	0.627	B	0.014	N
			SB	0.404	A	0.498	A	0.505	A	0.008	N	0.498	A	0.574	A	0.591	A	0.017	N
Main St	Del Amo Blvd	Torrance Blvd	NB	0.482	A	1.032	F	1.042	F	0.009	N	0.329	A	0.798	C	0.807	D	0.009	N
			SB	0.328	A	0.562	A	0.567	A	0.005	N	0.555	A	1.139	F	1.150	F	0.011	Y
Main St	Torrance Blvd	213th St	NB	0.556	A	0.945	E	1.032	F	0.087	Y	0.168	A	0.599	A	0.792	C	0.193	Y
			SB	0.349	A	0.456	A	0.614	B	0.159	N	0.639	B	1.099	F	1.254	F	0.155	Y
Main St	213th St	Carson St	NB	0.573	A	1.011	F	1.070	F	0.059	Y	0.466	A	0.796	C	0.926	E	0.130	Y
			SB	0.427	A	0.510	A	0.617	B	0.107	N	0.618	B	1.184	F	1.289	F	0.105	Y

Table 227 (Continued)

SUMMARY OF LEVEL OF SERVICE – ALTERNATIVE SITE ANALYSIS

Street	From	To		A.M. Peak-Hour Analysis								P.M. Peak-Hour Analysis							
				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT			
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	CHANGE	IMPA CT	V/C	LOS	V/C	LOS	V/C	LOS
Avalon Bl	Del Amo Blvd	I-405 NB Ramp	NB	0.402	A	0.890	D	0.932	E	0.042	Y	0.486	A	0.663	B	0.704	C	0.041	Y
			SB	0.416	A	0.554	A	0.577	A	0.023	N	0.516	A	1.077	F	1.128	F	0.051	Y
Avalon Bl	I-405 NB Ramp	Carson St	NB	0.436	A	0.581	A	0.647	B	0.065	N	0.536	A	0.641	B	0.705	C	0.064	Y
			SB	0.402	A	0.421	A	0.457	A	0.036	N	0.611	B	0.823	D	0.902	E	0.079	Y
Wilmington Ave	223rd St	I-405 Fwy	NB	0.742	C	0.966	E	0.979	E	0.013	Y	0.787	C	0.759	C	0.787	C	0.028	N
			SB	1.010	F	0.832	D	0.856	D	0.023	Y	1.083	F	1.325	F	1.348	F	0.023	Y
Wilmington Ave	I-405 Fwy	Carson St	NB	0.598	A	1.035	F	1.047	F	0.013	Y	0.482	A	0.614	B	0.643	B	0.028	N
			SB	0.464	A	0.658	B	0.682	B	0.023	N	0.634	B	1.167	F	1.190	F	0.023	Y
Wilmington Ave	Carson St	213th St	NB	0.911	E	1.288	F	1.298	F	0.010	Y	0.628	B	0.651	B	0.674	B	0.023	N
			SB	0.519	A	0.521	A	0.540	A	0.019	N	0.888	D	1.333	F	1.351	F	0.018	Y
Wilmington Ave	213th St	Del Amo Bl	NB	0.672	B	1.128	F	1.146	F	0.019	Y	0.593	A	0.838	D	0.856	D	0.018	N
			SB	0.458	A	0.665	B	0.676	B	0.010	N	0.674	B	1.189	F	1.212	F	0.023	Y
Carson St	Vera St.	I-405 Ramps	EB	0.520	A	0.471	A	0.527	A	0.056	N	0.579	A	0.505	A	0.560	A	0.055	N
			WB	0.388	A	0.340	A	0.370	A	0.031	N	0.478	A	0.488	A	0.556	A	0.068	N
Carson St	I-405 Ramps	Avalon Bl	EB	0.774	C	0.723	C	0.779	C	0.056	Y	0.902	E	0.942	E	0.997	E	0.055	Y
			WB	0.706	C	0.700	B	0.731	C	0.031	N	0.692	B	0.783	C	0.851	D	0.068	Y



Table 227 (Continued)

SUMMARY OF LEVEL OF SERVICE – ALTERNATIVE SITE ANALYSIS

Street	From	To		A.M. Peak-Hour Analysis								P.M. Peak-Hour Analysis							
				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT			
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	IMPACT	CT	V/C	LOS	V/C	LOS	V/C	LOS	V/C
Carson St	Avalon Bl	Main St	EB	0.529	A	0.862	D	0.974	E	0.112	Y	0.827	D	1.507	F	1.617	F	0.110	Y
			WB	0.642	B	1.073	F	1.135	F	0.062	Y	0.649	B	1.246	F	1.382	F	0.136	Y
Carson St	Main St	Figueroa St	EB	0.515	A	1.186	F	1.201	F	0.015	Y	0.851	D	1.521	F	1.555	F	0.034	Y
			WB	0.580	A	0.879	D	0.907	E	0.028	Y	0.626	B	1.255	F	1.282	F	0.027	Y
Carson St	Figueroa St	110 Ramp	EB	1.215	F	1.268	F	1.283	F	0.015	Y	1.374	F	1.433	F	1.467	F	0.034	Y
			WB	0.932	E	0.972	E	1.000	E	0.028	Y	0.643	B	0.670	B	0.698	B	0.027	N
Carson St	110 Ramp	Vermont Ave	EB	0.987	E	1.029	F	1.045	F	0.015	Y	1.211	F	1.263	F	1.297	F	0.034	Y
			WB	1.240	F	1.293	F	1.321	F	0.028	Y	1.089	F	1.135	F	1.162	F	0.027	Y
Del Amo Bl	Central Ave	Avalon Bl	EB	0.308	A	0.833	D	0.857	D	0.023	Y	0.463	A	0.615	B	0.638	B	0.023	N
			WB	0.454	A	0.711	C	0.724	C	0.013	N	0.496	A	0.949	E	0.978	E	0.028	Y
Del Amo Bl	Main St	Figueroa St	EB	0.103	A	0.376	A	0.442	A	0.067	N	0.207	A	0.248	A	0.395	A	0.147	N
			WB	0.187	A	0.182	A	0.303	A	0.121	N	0.137	A	0.435	A	0.553	A	0.119	N
Del Amo Bl	Figueroa St	110 Ramp	EB	0.694	B	0.724	C	0.805	D	0.081	Y	0.421	A	0.440	A	0.618	B	0.179	N
			WB	0.190	A	0.198	A	0.253	A	0.056	N	0.323	A	0.337	A	0.392	A	0.055	N
Del Amo Bl	110 Ramp	Hamilton	EB	0.624	B	0.651	B	0.732	C	0.081	Y	0.414	A	0.432	A	0.610	B	0.179	N
			WB	0.304	A	0.317	A	0.373	A	0.056	N	0.415	A	0.433	A	0.488	A	0.055	N

Table 227 (Continued)

SUMMARY OF LEVEL OF SERVICE – ALTERNATIVE SITE ANALYSIS

Street	From	To		A.M. Peak-Hour Analysis								P.M. Peak-Hour Analysis							
				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT			
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	IMPACT	V/C	LOS	V/C	LOS	V/C	LOS	V/C	IMPACT
Del Amo Bl	Hamilton	Vermont Ave	EB	0.183	A	0.190	A	0.202	A	0.012	N	0.220	A	0.230	A	0.255	A	0.026	N
			WB	0.130	A	0.136	A	0.157	A	0.021	N	0.132	A	0.138	A	0.158	A	0.021	N
Torrance Blvd	Main St	Figueroa St	EB	0.333	A	0.347	A	0.374	A	0.027	N	0.424	A	0.442	A	0.502	A	0.060	N
			WB	0.691	B	0.721	C	0.770	C	0.049	Y	0.287	A	0.299	A	0.347	A	0.048	N
Torrance Blvd	Figueroa St	Hamilton	EB	0.809	D	0.844	D	0.867	D	0.023	Y	0.996	E	1.039	F	1.090	F	0.051	Y
			WB	0.478	A	0.499	A	0.541	A	0.042	N	0.441	A	0.460	A	0.501	A	0.041	N
Torrance Blvd	Hamilton	Vermont Ave	EB	0.459	A	0.478	A	0.501	A	0.023	N	0.400	A	0.417	A	0.468	A	0.051	N
			WB	0.984	E	1.026	F	1.068	F	0.042	Y	0.534	A	0.557	A	0.598	A	0.041	N
213 St	Avalon Bl	Main St	EB	0.469	A	0.513	A	0.598	A	0.085	N	0.488	A	0.620	B	0.807	D	0.187	Y
			WB	0.383	A	0.556	A	0.710	C	0.154	Y	0.533	A	0.593	A	0.744	C	0.151	Y
<b>FREEWAY SEGMENTS</b>																			
I-405 Fwy	Vermont Ave	I-110 Fwy	NB	1.034	F(0)	1.282	F(1)	1.299	F(1)	0.017	N	0.843	D	0.884	D	0.900	D	0.016	N
			SB	0.860	D	1.066	F(0)	1.075	F(0)	0.009	N	1.001	F(0)	1.049	F(0)	1.069	F(0)	0.020	Y
I-405 Fwy	I-110 Fwy	Avalon Bl	NB	1.030	F(0)	1.080	F(0)	1.094	F(0)	0.015	N	0.886	D	0.929	D	0.943	E	0.014	N
			SB	0.891	D	0.933	E	0.941	E	0.008	N	1.030	F(0)	1.080	F(0)	1.097	F(0)	0.018	N

**Table 227 (Continued)**

**SUMMARY OF LEVEL OF SERVICE – ALTERNATIVE SITE ANALYSIS**

Street	From	To		A.M. Peak-Hour Analysis								P.M. Peak-Hour Analysis							
				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT				EXISTING 2003		FUTURE BASE		FUTURE +ALTERNATIVE PROJECT			
				V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	CHANGE	IMPA CT	V/C	LOS	V/C	LOS	V/C	LOS
I-405 Fwy	Avalon Bl	Carson St	NB	1.201	F(0)	1.259	F(1)	1.266	F(1)	0.007	N	0.979	E	1.026	F(0)	1.042	F(0)	0.016	N
			SB	0.999	E	1.047	F(0)	1.060	F(0)	0.013	N	1.163	F(0)	1.219	F(0)	1.232	F(0)	0.013	N
I-110 Fwy	SR-91	I-405 Fwy	NB	1.557	F(3)	1.632	F(3)	1.653	F(3)	0.021	Y	1.255	F(1)	1.315	F(1)	1.336	F(1)	0.021	Y
			SB	0.656	C	0.687	C	0.699	C	0.012	N	1.484	F(3)	1.555	F(3)	1.580	F(3)	0.025	Y
I-110 Fwy	I-405 Fwy	Torrance Blvd	NB	1.329	F(1)	1.393	F(2)	1.417	F(2)	0.024	Y	1.072	F(0)	1.123	F(0)	1.146	F(0)	0.023	Y
			SB	0.560	C	0.587	C	0.600	C	0.013	N	1.267	F(1)	1.327	F(1)	1.356	F(2)	0.029	Y
I-110 Fwy	Torrance Blvd	Carson St	NB	1.243	F(0)	1.303	F(1)	1.306	F(1)	0.004	N	1.002	F(0)	1.050	F(0)	1.058	F(0)	0.008	N
			SB	0.524	B	0.549	C	0.555	C	0.007	N	1.184	F(0)	1.241	F(0)	1.248	F(0)	0.006	N

V/C = Volume-to-capacity ratio

LOS = Level of Service

V/C ratios were calculated using Level of Service E capacity of 950 vch/hr/lane during peak hour.

Source: Kaku Associates.

### **4.7.3.L Public Services**

#### **4.7.3.L.(1) Fire Protection**

The County of Los Angeles Fire Department provides fire protection services in the City of Carson. Fire Station No. 36 is located approximately 0.5 mile south of the Cal Compact site. As the land uses proposed and population generated by this alternative would be similar to the Proposed Project, the demand for fire protection services would also be similar. Although the demand for fire protection services generated by this alternative may exceed the existing service capacity of the nearby fire stations, this demand would be addressed, as needed, with the expansion of facilities, equipment, and personnel which would be funded via existing mechanisms to which the project would be contributory (i.e., property taxes). Thus, the impact on fire protection services would be less than significant and similar to the Proposed Project.

#### **4.7.3.L.(2) Police Protection**

Police protection services are provided throughout the City of Carson by the Los Angeles County Sheriff's Department, through the Carson Sheriff's Station. As the land uses proposed and population generated by this alternative would be similar to the Proposed Project, the demand for police protection services would also be similar. As with the Proposed Project, this demand would need to be addressed, as needed, with the expansion of facilities, equipment, and personnel, which would be funded via existing mechanisms to which the project would be contributory (i.e., property taxes). Since the allocation of the additional review may not be directed toward police services, the impact on police protection services would be significant as is the case with the Proposed Project.

#### **4.7.3.L.(3) Schools**

The Los Angeles Unified School District (LAUSD) provides primary and secondary public education services for the City of Carson. The Cal Compact site would be served by Carson Elementary School, White Middle School, and Carson High School. This alternative would generate a similar number of public school students as the Proposed Project for a total of 616 public school students distributed as follows: 304 elementary students, 145 junior high school students, and 167 high school students.<sup>614</sup> As of the 2000-2001 school year, Carson Elementary School had a surplus capacity of 136 student spaces; White Middle School had a surplus capacity of 159 student spaces; and Carson High School had a capacity of 248 student

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<sup>614</sup> *The student generation forecast for this Alternative is calculated by utilizing the same methodology used for the Proposed Project.*

spaces.<sup>615</sup> Thus, assuming that these surplus capacity levels remain constant over time, there would be sufficient capacity at White Middle School and Carson High School, although this alternative would have a significant impact to Carson Elementary School before mitigation.

Although insufficient capacity exists at Carson Elementary School to accommodate all elementary school students generated prior to the provision of new classrooms, as is the case with the Proposed Project, payment of fees to the school district would fully mitigate this impact (pursuant to SB 50).<sup>616</sup> Thus, impacts to schools would be similar to the Proposed Project and would be less than significant.

#### **4.7.3.L.(4) Parks and Recreation**

This alternative would include a similar number of residential units, which would generate a similar population increase. This increase would create a demand for park and open space similar to the Proposed Project. The County of Los Angeles operates Victoria Park, a 36-acre regional park, located north of the Cal Compact site and the San Diego Freeway. Victoria Golf Course, an 18-hole public course, is also located immediately south of Victoria Park. In addition, nearby community parks include Carson Park, Del Amo Park, and John D. Calas Sr. Park, which provide recreational facilities, community rooms, and open space. It is assumed that this alternative would also include the same amount of active open space (11.4 acres of parks and 1.0 acre of bikeways) as the Proposed Project. Further, the City of Carson could add further mitigation to attain local planning objectives. Impacts would be similar to those of the Proposed Project.

#### **4.7.3.L.(5) Libraries**

The Cal Compact site would be served by the Los Angeles County Public Library. The closest community library is the Carson Regional Library located at 151 S. Carson Street approximately 0.25 mile south of the site. As the land uses proposed and the population generated by this alternative would be similar to the Proposed Project, the demand for library services would also be similar. This demand would be addressed, as needed, with the expansion of facilities, collections, and personnel, which would be funded via existing mechanisms to which the project would be contributory (i.e., property taxes). Thus, the impact on library services would be less than significant and similar to the Proposed Project.

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<sup>615</sup> *Los Angeles Unified School District, School Accountability Report Card, Data for School Year 2000-2001, Issued February 2002.*

<sup>616</sup> *California Government Code Section 65995(h).*

#### **4.7.3.M Energy Consumption**

Implementation of this alternative would result in the consumption of electricity and natural gas. Electricity and natural gas consumption from the operation of on-site uses would be similar to that of the Proposed Project. This energy consumption is within the available supplies and service capabilities of the respective utilities, Southern California Edison and the Southern California Gas Company. Impacts to energy resources and facilities would be less than significant. Impacts to energy resources and facilities would be similar to those of the Proposed Project.

#### **4.7.3.N Utilities**

##### **4.7.3.N.(1) Water Consumption**

Given the Alternative Project's identical development statistics and similarly sized site, relative to the Proposed Project, potable and reclaimed water consumption from operation of proposed uses on-site would be similar to that of the Proposed Project. Such consumption is within the supply and service capabilities of the California Water Service Company (CWSC). Impacts related to water consumption under this alternative would be less than significant and would be similar to those of the Proposed Project.

##### **4.7.3.N.(2) Wastewater**

Wastewater generation associated with this alternative uses would be comparable to that of the Proposed Project. This volume of wastewater is anticipated to be within the conveyance and treatment capabilities of the Los Angeles County Department of Public Works (for local sewer lines from individual structures and lift stations) and the Los Angeles County Sanitation Districts (for trunk sewer lines and wastewater treatment). Impacts to wastewater conveyance and treatment systems would be less than significant, and impacts would be similar to those of the Proposed Project.

##### **4.7.3.N.(3) Solid Waste**

Solid waste generation resulting from this alternative would be similar to that of the Proposed Project. The volume of solid waste generated by on-site uses would be reduced by implementation of project design features similar to the Proposed Project, which could achieve a substantial diversion of solid waste that would otherwise require disposal at regional landfills. The site is served by Waste Management, Inc., which operates a transfer station/materials recovery facility near the site. Various regional disposal facilities are anticipated to have permitted capacity to accept all the solid waste from the Cal Compact site. However, regional

landfill capacity is projected to be significantly reduced in coming years, unless more landfill capacity is permitted by regulatory agencies. As such, although several regional landfills currently have sufficient capacity to accept all project-generated solid waste, the impacts to regional landfill capacity are considered potentially significant. Therefore, impacts to solid waste facilities under this alternative would be significant, similar to those of the Proposed Project.

#### **4.7.3.O Visual Qualities (Aesthetics and Views)**

##### **Aesthetics**

Similar to the Proposed Project, the Cal Compact site is an underdeveloped area amidst surrounding development. At the same time, the site is also currently degraded due to past site uses. Development at the site would convert the site appearance from an undeveloped to a developed appearance, and would also include landscaping and visual treatments that address past site degradation. As with the Proposed Project, the loss of the visual relief would be considered a significant impact. The passive open space at this location could be landscaped to enhance the aesthetic character of the site. Such treatment would address the local site conditions and would not necessarily be considered more or less attractive than the enhanced bluffs at the Playa Vista site.

##### **Views**

The Cal Compact site does not lie adjacent to any unique view resources, does not lie within notable public view corridors, and thus, would not be subject to a significant view impact. Thus, this alternative would avoid the significant view impact on views of the bluffs along the short segment of Jefferson Boulevard adjacent to the Playa Vista site. At the same time, this site would not be conducive to providing the type of view amenity that would occur along Bluff Creek Drive under the Proposed Project. That view includes views of the bluffs as they rise dramatically near to the roadway, with the intervening riparian corridor adding an additional enhancement to the view. In contrast, the Cal Compact site lends itself to a flat landscaped, passive area. Site views are limited to the immediate adjacent area; e.g., the golf course.

#### **4.7.3.P Cultural Resources**

##### **4.7.3.P.(1) Paleontological Resources**

The Cal Compact site was operated as a municipal landfill between 1959 and 1965. The site has been generally vacant since landfill operations ceased. Development would occur over the existing soil cover and waste zone and would not impact native soils or geologic formations.

Thus, access to potential underlying resources would be precluded, and potential discovery of resources would not occur. Impacts would be less than significant. In contrast, the Proposed Project could have an impact on resources, but could also result in recovery of resources.

#### **4.7.3.P.(2) Archaeological Resources**

The Cal Compact site was operated as a municipal landfill between 1959 and 1965. The site has been generally vacant since landfill operations ceased. Development would occur over the existing soil cover and waste zone and would not impact native soils or geologic formations. Thus, access to potential underlying resources would be precluded, and potential discovery of resources would not occur. Impacts would be less than significant. In contrast, the Proposed Project could have an impact on resources, but could also result in recovery of resources.

#### **4.7.3.P.(3) Historical Resources**

There are no structures located at the Cal Compact site to be impacted. However, the existing structures at the Playa Vista site are not considered historical resources for the purposes of CEQA compliance and the demolition of these structures with the Proposed Project was found to be non-significant. Similar to the Proposed Project, there would be no impacts on historic resources.

### **4.7.4 SUMMARY OF COMPARATIVE IMPACTS**

Implementation of the Proposed Project at the Cal Compact site would result in a varied impact profile from the Playa Vista site with impacts better, similar or worse than those of the Proposed Project, depending upon the environmental topic. Implementation of the Cal Compact site would generally not avoid impacts that would be encountered at the Playa Vista site. A few conditions would be better and impacts would be avoided that are associated with unique features of the Playa Vista site (i.e., views of the bluffs); however, the alternative site would also not provide the view benefit related to those features that would occur due to the Project's design features at Playa Vista (i.e., the riparian corridor and bluff restoration). This alternative would also result in worse impacts to air quality and earth resources (grading), and less of a beneficial impact to the local jobs/housing balance.

### **4.7.5 RELATIONSHIP OF THE ALTERNATIVE SITE TO PROJECT OBJECTIVES**

Selection of an alternate site by the decision maker is most appropriate where the decision maker is also the developer, as in a government or quasi-government project such as a



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fire station or power generation plant wherein the power of eminent domain is available and economic feasibility is not necessarily the predominant factor. The “selection” of an alternate site by a governmental agency decision maker for a private development, however, would seem inappropriate because the decision maker lacks commensurate power to make such alternate site available for a private project and to approve or guarantee approval of the entitlements that would be needed to support such a selection. This is particularly true when the alternate site lies within a different governmental jurisdiction.

The provision of development at an alternative site could meet the Project basic objective related to the provision of a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile, and increasing efficiency in the utilization of infrastructure. Such development would also meet the basic objective to provide a new community that would generate jobs, housing and employment of a substantial scale and magnitude. Development at an alternative site would not be consistent with the Project’s basic objective to provide housing to meet market demand in the Westside of Los Angeles, nor the objective to address housing needs within the City of Los Angeles, the Westside in particular, pursuant to regional and local plans. This alternative would not meet objectives regarding implementation of a comprehensive program of resource protection, enhancement, and conservation specifically designed for the Playa Vista site, as the alternative site does not have similar natural features. This alternative would not contribute to the Project’s objective of providing a development that would be consistent with, and form linkages to, development, transportation, and conservation linkages with the adjacent Playa Vista First Phase Project.

Selection of an alternative site would entail acquisition, engineering, environmental, permit application and other start-up costs for the Applicant with no assurance that entitlements needed would be approved. There would be consequent loss of investment already made for like purpose relative to the Playa Vista site.

As discussed above, selection of an alternative site does not lend itself to the type of private development proposed for the Playa Vista site; would be difficult, if not impossible, to implement for the Applicant; and would not meet the Applicant’s basic objectives.

Table 228

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 7  
(ALTERNATIVE SITE) TO THE PROPOSED PROJECT\***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Earth</b>				
Grading	Non-Significant	Non-significant	Worse	Greater amount of grading volume.
Dewatering/Subsidence	No Impact	No Impact	Better	Less excavation/more fill, lower groundwater table, so little or no dewatering.
Seismic Hazards	Significant	Significant	Better	Same exposure to groundshaking/seiche, less liquefaction potential and no tsunami potential.
Slope Stability	No Impact	Non-Significant	Better	Absence of bluffs.
<b>Air Quality</b>				
Construction/Regional Emissions	Significant	Significant	Worse	Extensive grading and importation of fill.
Construction/Local Emissions	Non-Significant	Non-Significant	Similar	Generally similar with precise impacts dependant on design.
Operations/Regional Emissions	Significant	Significant	Similar	Similar amount of traffic generation.
Operations/Local Emissions	Non-Significant	Non-Significant	Similar	Similar amount of traffic generation.
<b>Water Resources/Hydrology</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Improvements to storm drainage.
Groundwater	Non-Significant	Non-Significant	Similar	Reduced groundwater recharge.
<b>Water Resources/Water Quality</b>				
Surface Water	Non-Significant	Non-Significant	Similar	Similar implementation of SWPPP, with associated BMPs and NPDES compliance.
Groundwater	Non-Significant	Non-Significant	Similar	Similar groundwater contamination/remediation.
<b>Biotic Resources</b>				
Plant Life	Beneficial	Beneficial	Better	Little natural resources occur on-site. No adjacent natural open spaces; thus no potential for indirect impacts.
Animal Life	Beneficial	Beneficial	Better	Little natural resources occur on-site. No adjacent natural open spaces; thus no potential for indirect impacts.

Table 228 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 7  
(ALTERNATIVE SITE) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Noise</b>				
Construction	Significant	Significant	Similar	Similar amount and types of construction.
Stationary	Non-Significant	Non-Significant	Similar	Similar amount and types of stationary noise sources and similar types of uses affected.
Mobile	Significant	Non-Significant	Worse	Sensitive noise sources occur more proximal to the site.
<b>Light and Glare</b>				
Natural Light – Shading	Non-Significant	Non-Significant	Worse	Similar amount and type of development; sensitive uses occur more proximal to the site.
Artificial Light and Glare	Non-Significant	Non-Significant	Worse	Similar amount and type of development; sensitive uses occur more proximal to the site.
<b>Land Use</b>				
Regulatory	Non-Significant	Non-Significant	Similar	Similar amendment to General Plan required.
Land Use Patterns	Non-Significant	Non-Significant	Worse	No integration of east and west ends of Playa Vista First Phase Project.
<b>Mineral Resources</b>				
Mineral Resources	No Impact	No Impact	Similar	Mineral resources would be similar.
<b>Safety/Risk of Upset</b>				
Safety/Risk of Upset	Non-Significant	Non-Significant	Similar	Similar conditions to the Proposed Project site.
<b>Population, Housing and Employment</b>				
Population	Non-Significant	Non-Significant	Similar	Similar
Housing	Beneficial	Beneficial	Similar	Increased opportunities and choice.
Employment	Beneficial	Beneficial	Similar	Net increase in employment.
Jobs/House Bal.	Beneficial	Beneficial	Worse	Ratio at the Alternative site is 1.66 in contrast to 2.66 in Project's Local Area. Thus, Project's 0.45 ratio could better service the more jobs rich, Project area.
<b>Transportation</b>				
Traffic and Circulation	Significant	Significant	Similar	Similar amount of traffic.
Parking	No Impact	No Impact	Similar	Parking impacts would be internally mitigated.
Bicycle Plan	Beneficial	Beneficial	Worse	No adjacency to or expansion of existing bicycle path system or plan.

Table 228 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 7  
(ALTERNATIVE SITE) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Public Services</b>				
Fire Protection	Non-Significant	Non-Significant	Similar	Similar demand for service, with revenue generation.
Police Protection	Significant	Significant	Similar	Similar demand for service, with revenue generation.
Schools	Non-Significant	Non-Significant	Similar	Similar demand for service, with revenue generation.
Parks and Recreation	Non-Significant	Non-Significant	Similar	Would include the same amount of active open space; and could be mitigated to local standards.
Libraries	Non-Significant	Non-Significant	Similar	Similar demand for service, with revenue generation.
<b>Energy Consumption</b>				
Energy Consumption	Non-Significant	Non-Significant	Similar	Similar amount of housing and commercial uses.
<b>Utilities</b>				
Water Consumption	Non-Significant	Non-Significant	Similar	Similar amount of housing and commercial uses.
Wastewater	Non-Significant	Non-Significant	Similar	Similar amount of housing and commercial uses.
Solid Waste	Significant	Significant	Similar	Similar amount of housing and commercial uses. Same landfill capacity shortfall issues.
<b>Visual Quality (Aesthetics and Views)</b>				
Aesthetics	Significant	Significant	Similar	Would convert developed area to a developed appearance, but within a less impactful context; and would replace degraded conditions with new landscaping/visual treatments.
Views	Non-Significant	Significant	Better/Worse	Would avoid the significant impact on bluff views along a short segment of Jefferson Boulevard; would not offer a view benefit equivalent to that occurring along Bluff Creek Drive.

Table 228 (Continued)

**SUMMARY COMPARISON OF IMPACTS OF ALTERNATIVE 7  
(ALTERNATIVE SITE) TO THE PROPOSED PROJECT \***

<b>Issue Areas</b>	<b>Alternative Net Impact</b>	<b>Proposed Project Net Impact</b>	<b>Comparison of Alternative</b>	<b>Result of Development of the Alternative</b>
<b>Cultural Resources</b>				
Paleontological Resources	Non-Significant	Non-Significant	Better/Worse	No impact on resources, no opportunity for recovery of resources.
Archaeological Resources	Non-Significant	Non-Significant	Better/Worse	No impact on resources, no opportunity for recovery of resources.
Historical Resources	No Impact	No Impact	Similar	In either case, no historic resources would be impacted.

\* *Significance ratings reflect impacts with mitigation. Impact comparisons for all topics other than Traffic and Circulation are based on impacts after mitigation. Conclusions regarding impacts for Traffic and Circulation are based on impacts prior to mitigation.*

*Source: PCR Services Corporation, 2003.*

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## 5.0 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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State CEQA Guidelines require the identification of an environmentally superior alternative to the Proposed Project and, if the environmentally superior alternative is the “No Project Alternative,” the identification of an environmentally superior alternative from among the remaining alternatives.<sup>617</sup> An environmentally superior alternative is an alternative to the Proposed Project that would reduce and/or eliminate the unmitigated, significant adverse environmental impacts associated with a Proposed Project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the Proposed Project.

Selection of an environmentally superior alternative was based, first, on an evaluation of the extent to which the alternatives reduce or eliminate the significant impacts associated with the Proposed Project, and, second, on an across-the-board comparison of the remaining environmental impacts of each alternative. The relative environmental characteristics are comparatively summarized in Table 229 on pages 1424 through 1427, which presents the conclusions from each of the individual alternative sections above. The table indicates whether each alternative’s environmental impacts associated with each environmental category would be “Similar,” “Better” or “Worse” than those of the Proposed Project, as determined in the summary tables for each alternative in the previous sections.

These general rankings regarding the relative merits of the alternatives are elaborated upon in Table 230 on page 1428. Table 230 provides quantitative information regarding the characteristics of each of the alternatives for selected topics.<sup>618</sup> The topics chosen for inclusion in the table are those which help to distinguish between the relative characteristics of those alternatives which would convert the site to a largely developed, mixed-use community.

An absolute determination of the environmentally superior alternatives for a project like the Proposed Project is difficult for two reasons. First, due to the scope of the Project with multiple proposed uses to meet varying objectives, alternative projects invariably lead to “Better” impact regarding some environmental categories, and “Worse” impact regarding others. The identification of which categories should prevail in an overall analysis is subject to differing

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<sup>617</sup> CEQA Guidelines, Section 15126.6(e)(2).

<sup>618</sup> Alternative 7, an Alternative site, is not included in the table due to the fact that many of the impacts as they relate to development at an alternative site are not equally comparable on a quantitative basis.

Table 229

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

Issue Area	Alternative 1: No Project	Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning	Alternative 3: Existing Specific Plan- Buildout	Alternative 4: Reduced Intensity – 25% Reduction	Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office	Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses	Alternative 7: Designated Alternative Site
<b>Earth</b>							
Grading	Better/Worse	Better/Worse	Worse	Similar	Similar/Better	Similar/Better	Worse
Dewatering/Subsidence	Similar	Better/Similar	Similar	Similar	Similar	Similar/Better	Better
Seismic Hazards	Better	Better	Similar	Similar/Better	Similar/Better	Similar/Better	Better
Slope Stability	Worse/Similar	Worse/Similar	Similar	Similar	Similar	Similar	Better
<b>Air Quality</b>							
Construction/Regional Emissions	Better	Better	Similar	Better	Better	Better	Worse
Construction/Local Emissions	Better	Better	Similar	Better	Better	Better	Similar
Operations/Regional Emissions	Better	Better	Worse	Better	Better	Better	Similar
Operations/Local Emissions	Better	Better	Worse	Better	Better	Better	Similar
<b>Water Resources/Hydrology</b>							
Surface Water	Similar	Similar	Similar	Similar	Better/Similar	Similar	Similar
Groundwater	Similar	Similar	Worse	Similar	Better/Similar	Similar	Similar
<b>Water Resources/Water Quality</b>							
Surface Water	Similar	Similar	Worse	Similar	Similar	Similar	Similar
Groundwater	Similar	Better	Similar	Similar	Similar	Similar	Similar
<b>Biotic Resources</b>							
Plant Life	Worse	Worse	Better	Better	Better	Better	Better
Animal Life	Worse	Worse	Better	Better	Better	Better	Better

Table 229 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Noise</b>							
Construction	Better	Better	Similar	Better	Better	Better	Similar
Stationary	Better	Better	Similar	Better	Better	Better	Similar
Mobile	Better	Better	Similar	Better	Better	Better	Worse
<b>Light and Glare</b>							
Natural Light – Shading	Better	Better	Worse	Similar	Similar	Better	Worse
Artificial Light and Glare	Better	Better	Worse	Similar	Similar	Similar	Worse
<b>Land Use</b>							
Regulatory	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Similar
Land Use Patterns	Better	Better	Worse	Similar	Worse	Worse	Worse
<b>Mineral Resources</b>							
Mineral Resources	Better	Similar	Similar	Better	Similar	Similar	Similar
<b>Safety/Risk of Upset</b>							
Safety/Risk of Upset	Better	Better	Similar	Better	Similar/Better	Similar/Better	Similar



Table 229 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Population, Housing and Employment</b>							
Population	Worse	Worse	Worse	Similar	Similar	Similar	Similar
Housing	Worse	Worse	Worse	Worse	Worse	Worse	Similar
Employment	Worse	Worse	Better	Worse	Worse	Worse	Similar
Jobs/Housing Balance	Worse	Worse	Worse	Similar	Better/Worse	Worse	Worse
<b>Transportation</b>							
Traffic and Circulation <sup>a</sup>	Better	Better	Worse	Better	Better	Better	Similar
Parking	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Bicycle Plan	Worse	Worse	Worse	Similar	Similar	Similar	Worse
<b>Public Services</b>							
Fire Protection	Better	Better	Similar	Better	Better	Better	Similar
Police Protection	Better	Better	Similar	Better	Better	Better	Similar
Schools	Better	Better	Better	Better	Better	Better	Similar
Parks and Recreation	Worse	Worse	Better/Worse	Worse	Worse	Worse	Similar
Libraries	Better	Better	Better	Better	Better	Better	Similar
<b>Energy Consumption</b>							
Energy Consumption	Better	Better	Worse	Better	Better	Better	Similar

Table 229 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Utilities</b>							
Water Consumption	Better	Better	Better	Better	Better	Better	Similar
Wastewater	Better	Better	Worse	Better	Better	Better	Similar
Solid Waste	Better	Better	Better	Better	Better	Better	Similar
<b>Visual Qualities (Aesthetics and Views)</b>							
Aesthetics	Better/Worse	Better/Worse	Worse	Similar	Similar	Better	Similar
Views	Better	Better	Worse	Better	Better	Better	Better/Worse
<b>Cultural Resources</b>							
Paleontological Resources	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Better/Worse
Archaeological Resources	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Better/Worse
Historical Resources	Similar	Similar	Similar	Similar	Similar	Similar	Similar

Source: PCR Services Corporation, 2003.

Table 230

## QUANTITATIVE COMPARISON OF THE ALTERNATIVES TO THE PROPOSED PROJECT

Environmental Impact	Proposed Project	Alternative 1: No Project	Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning	Alternative 3: Existing Specific Plan – Buildout	Alternative 4: Reduced Intensity – 25% Reduction	Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office	Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses
<b>Traffic Circulation</b>							
Daily Trips	24,220	0 (-)	1,568	38,696 (+)	18,785 (-)	11,817 (-)	3,809 (-)
Locations at LOS E or F (A.M./P.M.), prior to mitigation	90/108	0/0	83/104 (-)	97/113 (+)	89/106 (-)	87/105 (-)	83/104 (-)
<b>Active Open Space (Parks)</b>	12.4 acres <sup>c</sup>	0 acres (-)	0 acres (-)	0 acres (-)	9.6 acres (-)	9.6 acres (-)	9.6 acres (-)
<b>School (students)</b>	675	0 (-)	9 (-)	413 (-)	505 (-)	469 (-)	155 (-)
<b>Population/Housing/Employment</b>							
Population	5,720	0 (-)	0 (-)	0 (-)	4,290 (-)	4,290 (-)	1,430 (-)
Housing (units)	2,600	0 (-)	0 (-)	0 (-)	1,950 (-)	1,950 (-)	650 (-)
Employment	1,180	0 (-)	216 (-)	9,252 (+)	885 (-)	60 (-)	0 (-)
Jobs/Housing Ratio <sup>a</sup>	0.45	N/A	(-) <sup>b</sup>	(-) <sup>b</sup>	0.45 (=)	0.03 (+)	0 (-)
Jobs/housing ratio in Local Area with Project <sup>a</sup>	2.43	2.66 (-)	2.67 (-) <sup>b</sup>	3.06 (-) <sup>b</sup>	2.49 (-)	2.46 (-)	2.59 (-)

Note: This table includes only the Proposed Project and the alternatives that have development components that are different than those of the Proposed Project. As such, Alternative 7, Alternate site, is not included. Further, the environmental impact areas are a sampling of representative and quantifiable topics.

(+) = greater/more than the Proposed Project

(=) = same/equivalent than the Proposed Project

(-) = fewer/less than the Proposed Project

<sup>a</sup> The comparison for this topic (+, -, or =), is based on whether the ratio is more favorable with regard to the regional goal, rather than absolutely greater or less than the Proposed Project.

<sup>b</sup> These alternatives would add jobs, and no housing to a jobs rich area.

<sup>c</sup> 11.4 acres of parks and 1.0 acre of bike lanes.

Source: PCR Services Corporation, 2003.

values amongst the population. Second, it is difficult to develop a total picture because some categories are relatively more or less important, and cannot be simply summed.

Nonetheless, per the CEQA Guidelines, the No Project-No Development Alternative (Alternative 1) would be the environmentally superior alternative, as the significant impacts that would occur with the Proposed Project would not occur with this alternative. CEQA requires that when the No Project Alternative is selected as the environmentally superior alternative, another alternative needs to be selected as environmentally superior. Other than the two No Project alternatives, Alternative 6, 75 percent Residential Reduction, No Retail, Office, or Community-Serving Uses, would be considered the Environmentally Superior Alternative. While these alternatives have been designated as Environmentally Superior, it should be noted that Table 229 identifies a considerable number of environmental topics for which development of the Proposed Project is considered more beneficial than these alternatives, such as the addition of housing and employment opportunities in the region.

Implementation of the remaining alternatives would result in trade-offs among the various environmental categories. As indicated in Table 230, the trip generation rate and numbers of intersections with significant impacts is less under some of the alternatives than the Proposed Project.

Also indicated in Table 230 are the relative contributions of the various alternatives to the housing and employment needs of the area. As indicated, the Proposed Project results in the highest amount of housing. Alternative 3 results in the most employment opportunities but would provide no housing units.

Also indicated in the table is the jobs/housing ratio for each of the alternatives. This ratio describes the distribution of residents and employees within an area and indicates the potential for individuals to live in proximity to their work, thus reducing traffic and travel times, as well as air quality and noise pollution. The ratio for the Proposed Project would improve the ratio in the jobs-rich Local Area to the greatest extent. Alternatives 2 and 3 would generate jobs with no housing and would have an adverse affect on the jobs/housing ratio.

The comparison of school impacts indicates that the Proposed Project would create the biggest demand on schools, due to its greater relative increase in residential population. All of the alternatives, with the exception of the two No Project Alternatives, include somewhat similar habitat restoration as occurs with the Proposed Project.

This review of the relative environmental superiority or inferiority of each alternative does not consider the extent to which the alternative projects achieve the basic objectives of the Proposed Project. Discussions of how each of the alternatives satisfies the Project's basic objectives are included in the preceding analysis of each respective alternative.

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## VIII. ORGANIZATIONS AND PERSONS CONTACTED

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### 8.0 DOCUMENT PREPARATION

#### 8.1 Lead Agency

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- Hamilton, Gordon, Los Angeles City Planning Department
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#### 8.2 Other City of Los Angeles Agencies

- Pfann, Susan, City Attorney's Office, Los Angeles City Attorney's Office
- Brown, Jack, City Attorney's Office, Los Angeles City Attorney's Office
- Kumabe, Colin, Los Angeles City Department of Building and Safety
- Hsu, David, Los Angeles City Department of Building and Safety, Grading Section
- Prevost, Dana, Los Angeles City Department of Building and Safety, Grading Section
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- Schmidt, Patrick, Los Angeles City, Department of Public Works, Bureau of Engineering
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- Doty, James, Los Angeles City, Department of Public Works, Bureau of Engineering
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- Kim, Jay, Los Angeles Department of Transportation
- Carranza, Tom, Los Angeles Department of Transportation

- Rifkin, Allyn, Los Angeles County Transportation Department
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Los Angeles Fire Department

- Wells, William, Captain, Los Angeles City, Fire Department
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Los Angeles Police Department

- Booker, Fred, Lieutenant, Los Angeles City, Police Department
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- Jeffrey H. Altschul, Historical/Cultural Resources

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- Bruce Lander

### **8.5 Other Agencies and Organizations**

- Nila, Gina, Public Works, City of Whittier
- Shay, Jerry, Landfill Supervisor, City of Burbank
- Chan, Grace, Sanitation Districts of Los Angeles County
- Mendoza, Larry, Sanitation Districts of Los Angeles County
- Nagle, Richard, West Basin Municipal Water District
- Jovani, Gayle, Southern California Gas Company
- Soares, Charles, Southern California Gas Company.
- Thompson, John, Southern California Gas Company
- Dmitriew, Alex, Crown Disposal, Inc
- Matlock, Bruce, Bradley Landfill, Waste Management, Inc.
- Williams, Mike, Waste Management of California, Inc.
- Terrell, Matt, Chiquita Canyon Sanitary Landfill
- Kabalik, Jim, Hughes Aircraft Company

## **8.6 Project Applicant**

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- Catherine Tyrrell, Director, Environmental Affairs

## IX. LIST OF ACRONYMS

### ACRONYMS

Acronym	Title
ACM	Asbestos Containing Materials
ADT	Average Daily Traffic
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
APE	Area of Potential Effect
ATCS	Adaptive Traffic Control System
ATP	Archaeological Treatment Plan
ATSAC	Automatic Traffic Surveillance and Control
BMP	Best Management Practices
BTEX	Benzene, Toulene, Ethylbenzene, and Xylene
CAA	Clean Air Act
CalEPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CAO	Cleanup and Abatement Order
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CESA	California Endangered Species Act
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan

<b>Acronym</b>	<b>Title</b>
CIWMB	California Integrated Waste Management Board
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CO	Carbon Monoxide
ColWMP	Countywide Integrated Waste Management Plan
COP	California Ocean Plan
CPT	Cone Penetrometer Testing
CPU	Community Plan Update
CTC	California Transportation Commission
CTCSP	Coastal Transportation Corridor Specific Plan
CTR	California Toxic Rule
CWA	Clean Water Act
CWC	California Water Code
D/C	Demand-to-Capacity Ratio
dB	Decibel
dBA	Decibel, A-weighted
DOGGR	Department of Oil, Gas, and Geothermal Resources
DTSC	Department of Toxic Substances Control
DU	Dwelling Unit
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMS	Emergency Medical Service
EPA	Environmental Protection Agency
ETI	Exploration Technology Inc.
FAA	Federal Aviation Administration
FAR	Floor Area Ratio[1]
FEMA	Federal Emergency Management Agency

<b>Acronym</b>	<b>Title</b>
FHWA	Federal Highway Administration
FINDS	Facility Index System
FIRM	Flood Insurance Rate Maps
GWTF	Groundwater Treatment Facility
HAC	Hughes Aircraft Company
HAZWOPER	Hazardous Waste Operations and Emergency Response
HAZNET	Hazardous Waste Information System (CalEPA)
HBRG	Health Based Remediation Goals
HCS	OSHA Hazard Communication Standard
HHWE	Household Hazardous Waste Element
HOV	High-occupancy Vehicle
HTP	Hyperion Treatment Plant
HTS	Hyperion Treatment System
HUD	Department of Housing and Urban Development
HVAC	Heating, Ventilating and Air Conditioning
HWCL	State Hazardous Waste Control Law
ICO	Interim Control Ordinance
IIPP	Injury and Illness Prevention Program
KSF	Thousand Cubic Feet Per Day
LACDPW	Los Angeles County Department of Public Works
LACFD	Los Angeles County Fire Department
LADBS	City of Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAGWRP	The Los Angeles/Glendale Water Reclamation Plant
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport

<b>Acronym</b>	<b>Title</b>
L <sub>dn</sub>	Day-night Average Sound Level
LEL	lower explosive limit
L <sub>eq</sub>	Equivalent Noise Level
LMU	Loyola Marymount University
LNG	Liquefied Natural Gas
LOS	Level of Service
LUST	Leaks Underground Storage Tanks
MAP	Million Annual Passengers
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
MDHC	McDonnell Douglas Helicopter Company
MGD	Million Gallons per Day
MRF	Materials Recovery Facility
MSL	Mean Sea Level
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standard
NDFE	Nondisposal Facility Element
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFA	No Further Action
NOS	North Outfall Sewer
NO <sub>x</sub>	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
O <sub>3</sub>	Ozone
OEHHA	Office of Environmental Health Hazard Assessment (California)
OSHA	Occupational Safety and Health Administration
PCBs	Polychlorinated Biphenyls

<b>Acronym</b>	<b>Title</b>
PCE	Perchloroethylene
RCPG	Regional Comprehensive Plan and Guide
RCRA	Federal Resource Conservation and Recovery Act
ROC	Reactive Organic Compounds
ROG	Reactive Organic Gases
RPZ	Runway Protection Zone
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Management District
SCE	Southern California Edison
SCGC	Southern California Gas Company
SEA	Significant Ecological Area
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SMMBL	Santa Monica Municipal Bus Line
SO <sub>2</sub>	Sulfur Dioxide
SRCRD	Solid Resources Citywide Recycling Division
SRRE	Source Reduction and Recycling Element
STIP	Statewide Transportation Improvement Program
SUSMP	Manual for the Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Management Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TBT	Tributyl Tin
TCE	Trichloroethylene
TDM	Transportation Demand Management
TDS	Total Dissolved Solids

<b>Acronym</b>	<b>Title</b>
TIA	Traffic Impact Analysis
TKN	Kjedahl nitrogen
TMDL	Total Maximum Daily Load
TPH	Total Petroleum Hydrocarbons
TPL	Trust for Public Land
TPS	Transit Priority System
TRIS	Toxic Chemical Release Inventory System
TSD	Transport, Storage, Dispose
TSM	Transportation Systems Management
TSP	Total Suspended Particulates
TTLC	Total Threshold Limit Concentration
TTM	Tentative Tract Map
TWRP	Tillman Water Reclamation Plant
ULEV	Ultra Low-Emission Vehicle
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
V/C	Volume/Capacity Ratio
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VTTM	Vesting Tentative Tract Map
WBMWD	West Basin Municipal Water District
WBWRP	West Basin Water Recycling Plant
WLA TIMP	West Los Angeles Transportation Improvement and Mitigation Program
ZEV	Zero Emission Vehicle



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