ERRATA #3 TO THE FINAL EIR

DRAFT EIR

Section V (General Impact Categories)

The discussion of irreversible environmental changes associated with the Development Project was inadvertently omitted from the Draft EIR. Thus, the following text has been added to Section V (General Impact Categories):

SIGNIFICANT IRREVERSIBLE CHANGES TO THE ENVIRONMENT

Section 15126.2(c) of the *CEQA Guidelines* states that significant irreversible environmental changes associated with a project shall be discussed, including the following:

- Uses of nonrenewable resources during the initial and continued phases of the project that may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely;
- Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area), which generally commit future generations to similar uses; and
- Irreversible damage that could result from environmental accidents associated with the project.

The Add Area Project does not include or allow for development of any new land uses. Thus, the Add Area Project would not result in significant irreversible environmental changes related to those issues described above.

The Development Project site is currently developed and is located in an urbanized area of the City. Implementation of the Development Project would represent a continued long-term commitment to use of the sites. The Development Project would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. However, the Development Project would not require a large commitment of any of these resources, and impacts related to this issue would be less than significant.

The Development Project includes development of a mixed-use development in an urbanized area that is already served by an existing roadway system and utility infrastructure. Implementation of the Development Project does not include infrastructure improvements that would commit future generations to using the Development Project site for the proposed land uses, and no impacts related to this issue would occur.

With the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in a retail/commercial setting, the Development Project would not involve the routine use, transport, or disposal of hazardous materials. Also, as discussed in Section IV.G (Hazards and Hazardous Materials), during construction the Development Project Applicant would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. Additionally, the Project Applicant would be required to implement Mitigation Measures G-1 through G-7 related to the potential presence of underground storage tanks (USTs), polychlorinated biphenyls (PCBs), asbestos-containing materials (ACMs), lead-based paint (LBP), and possible soil contamination. No significant environmental (contamination) issues would occur at the site, and no further investigations relative to the environmental conditions on the site are needed. Therefore, the Development Project would not result in irreversible damage that could result from environmental accidents, and no significant impacts related to this issue would occur.

REVISED DEVELOPMENT PROJECT AND ADDITIONAL ANALYSIS

INTRODUCTION

Since initial circulation of the Casden Sepulveda Project Final EIR in October 2012, in response to input from the public and City staff and decision makers and to reduce the significant impacts of the Development Project, the Development Project Applicant has made revisions to the Development Project as described in the Casden Sepulveda Project Draft EIR. (The Add Area Project has not changed from its description in the Draft EIR.) To help the readers easily understand the changes to the Development Project, the project description from Section II (Project Description) from the Draft EIR is presented below with project details that have been deleted shown in ~~strikethrough~~, and new project details shown in underlined.

Additional analysis was conducted for the Revised Development Project that addresses each of the environmental issues that were previously analyzed within the scope of the Casden Sepulveda Project EIR for the Development Project. The conclusions identified in the Draft EIR are provided as a reference for each environmental issue area for purpose of describing how the changes to the Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

REVISED DEVELOPMENT PROJECT DESCRIPTION

A. PROJECT APPLICANT

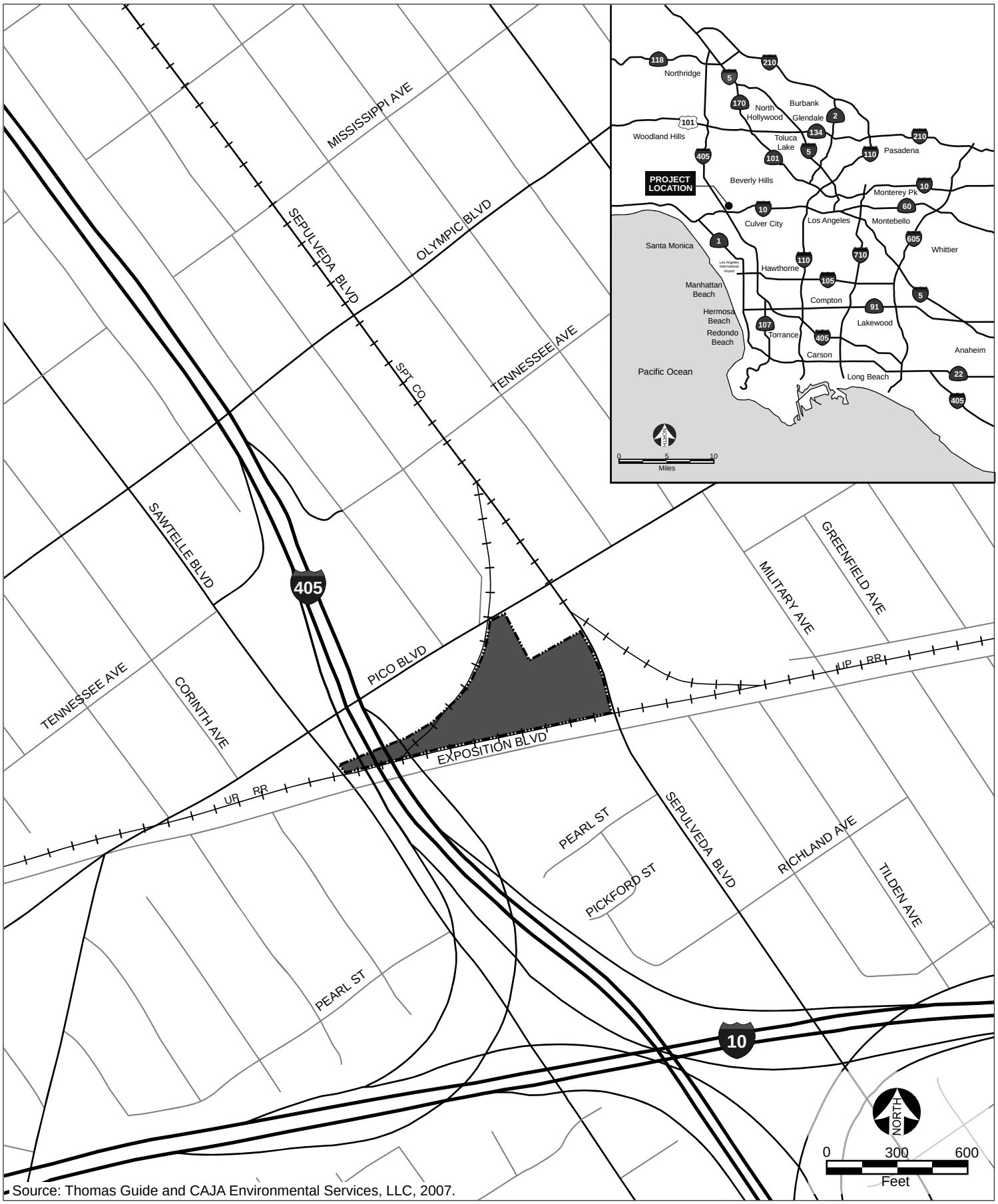
The Project Applicant for the Proposed Casden Sepulveda Project (the "Proposed Development Project") is Casden West LA LLC, located at 9090 Wilshire Boulevard, Floor 3, Beverly Hills, California 90211, c/o Howard Katz. The Project Applicant for the Proposed Add Area Project is the City of Los Angeles Department of City Planning.

B. PROJECT LOCATION

The sites of the Development and Add Area Projects are located within the southwestern portion of the West Los Angeles Community Plan (the "WLA Community Plan") area of the City of Los Angeles (the "City"). The WLA Community Plan area is generally bound to the north by Wilshire and Santa Monica Boulevards, Canfield Avenue to the east, Exposition Boulevard to the south, and Centinela Avenue to the west. The irregular shaped Development Project site comprises the following addresses: 11122 through 11150 Pico Boulevard and 2431 and 2441 South Sepulveda Boulevard, as well as the Los Angeles County Metropolitan Transportation Authority ("Metro")-owned land to the south. The Add Area Project site consists of several parcels that encompass approximately 8.86 acres of land and comprises the following addresses: 11240, 11250, 11120, 11600, and 11110 Pico Boulevard, and encompasses Assessor Parcel Numbers (APNs) 4256-010-901 and 4256-010-011. The approximately 6.59-acre Development Project site is located just east of and abutting Interstate 405 (the "San Diego Freeway"), the northern extent fronts Pico Boulevard, the eastern extent fronts Sepulveda Boulevard, and the southern extent fronts Exposition Boulevard. The San Diego Freeway and Interstate 10 (the "Santa Monica Freeway"), as well as a network of major roadways provide regional access to the Development and Add Area Project site (Refer to Figure II-1, Regional and Project Vicinity Map).

Existing Uses

The exiting uses on the Development Project site include California Portland Cement (a cement batch plant), West Los Angeles Building Materials (a building materials sales company), and a Metro easement that does not contain any structures, and billboards. The existing on-site uses located on the main portion of the Development Project site (Assessor's Parcel Number [APN] 4256010006, 11122 through 11150 Pico Boulevard) are attributed to California Portland Cement (a cement plant), which occupies approximately 66,300 square feet. There are several industrial structures currently located on this parcel associated with the cement plant, including an aggregate storage structure, cement silos, the existing batch plant, a central mixing plant, a restroom, a vehicle maintenance area, and a modular unit used as the batch plant office. The southern portion of this parcel extends into the Metro easement. Other on-site uses include the West Los Angeles Building Materials company, which includes an office, a sales office, and



Source: Thomas Guide and CAJA Environmental Services, LLC, 2007.

CAJA Environmental Services, LLC

Figure II-1
Regional and Project Vicinity Map

This page left blank intentionally.

two storage areas. The West Los Angeles Building Materials company parcel is currently operating as an industrial parking facility and is designated under the General Plan as Public Facility. Implementation of the Proposed Development Project would require the demolition of all the structures currently located on the Development Project site.

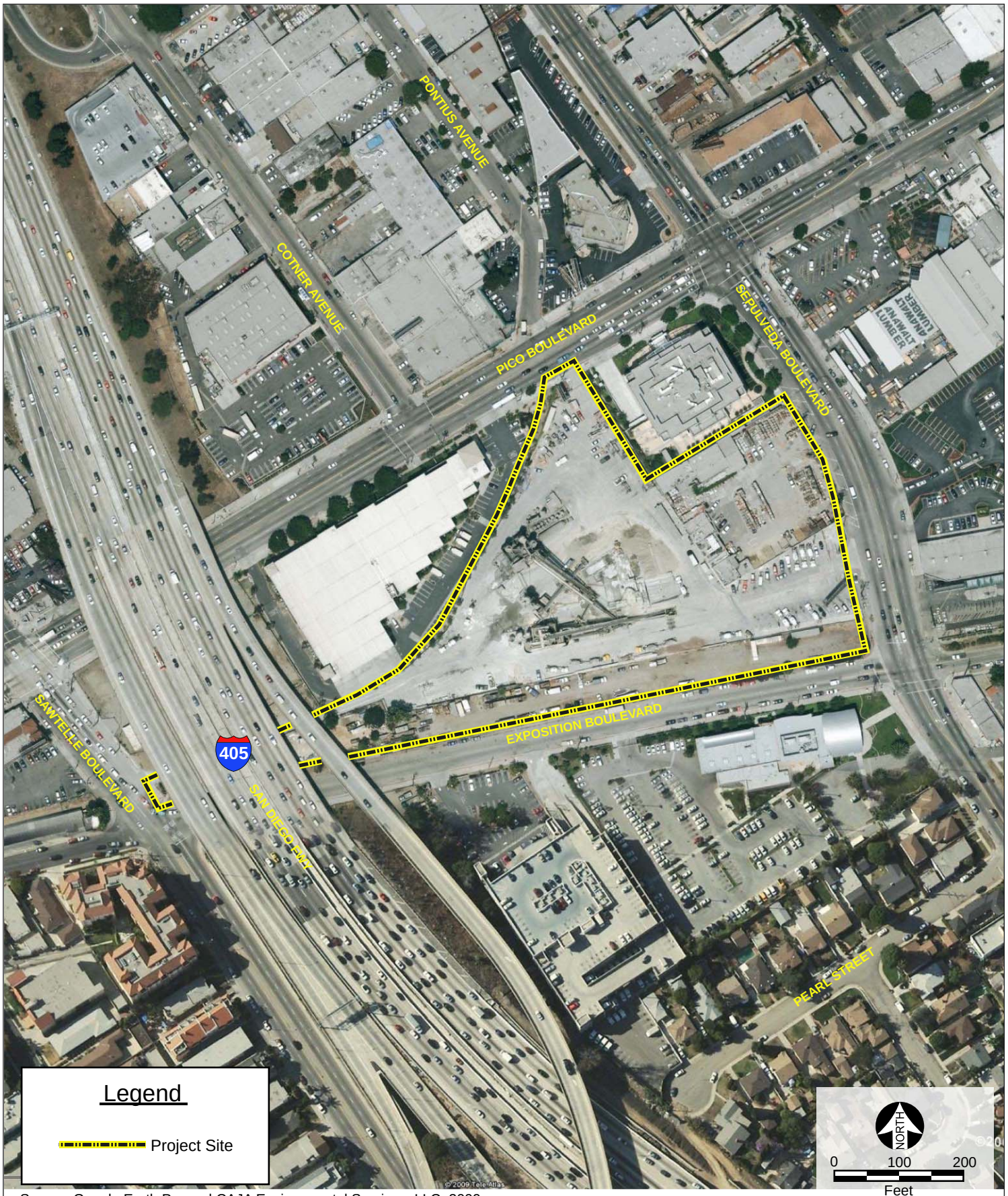
The Add Area Project site is developed with a public storage facility, a County office building, and a maintenance yard.

Surrounding Land Uses

Surrounding land uses in the immediate vicinity of the sites of the Development and Add Area Projects are characterized by a mix of commercial retail uses and low- to mid-density residential. Figure II-2, Aerial Photograph of the Development Project Site, provides an aerial view of the uses within the vicinity of the Development Project site. Commercial uses are located along the arterial roadways surrounding the Development Project site. The mix of single-family and multi-family residential uses are located along secondary roadways, not adjacent to, but within the immediate vicinity of the Development Project site. The closest multi-family residences to the Development Project site are located on the southwest corner of Exposition Boulevard and Sawtelle Boulevard, approximately 0.09 mile southwest of the Project site; fronting Sepulveda Boulevard just south of Pearl Street, approximately 0.11 mile southeast of the Development Project site; and fronting South Bentley Avenue north of Pico Boulevard, approximately 0.14 mile northeast of the Development Project site. The closest single-family residences are located a block south of the Development Project site, along Pearl Street.

The Development Project site is bounded to the north and west by a public storage facility (part of the Add Area Project site); to the north and east by a County of Los Angeles office building (part of the Add Area Project site); to the east by Sepulveda Boulevard, with commercial property (a lumber company); a U.S. post office and a City industrial facility (office and vehicle service facility for Los Angeles Department of Transportation [LADOT] parking enforcement) to the south of Exposition Boulevard beyond; and a commercial property and the San Diego overpass to the northwest and west. Active industrial uses are located just north of the Development Project site along the north side of West Pico Boulevard on the east side of Pontius Avenue.

This page left blank intentionally.



Source: Google Earth Pro and CAJA Environmental Services, LLC, 2009.

CAJA Environmental Services, LLC

Figure II-2
Aerial Photograph of the
Development Project Site

This page left blank intentionally.

Land Use and Zoning Regulations

WLA Community Plan

The sites of the Development and Add Area Projects are located within the WLA Community Plan Area, which is one of 35 community plan areas that make up the City's General Plan Land Use Element. Under the WLA Community Plan most of the Development Project site is designated as Light Industrial, which allows for limited industrial and manufacturing uses with the exception of a portion of the Development Project site along Exposition Boulevard that is designated as Public Facility. The permitted uses under the Public Facility land use designation include public parking facilities located under freeway rights-of-way, railroad right-of-way, fire and police stations, and joint public and private developments, among other uses. Parcels within the Add Area Project site are designated as Light Industrial and Public Facility in the WLA Community Plan.

City of Los Angles Municipal Code

Almost the entirety of the Development Project site is zoned under the City of Los Angeles Municipal Code (LAMC) as M2-1-O. The "M2" zoning corresponds to the Development Project site's Light Industrial land use designation; the "1" represents Height District 1; and "O" indicates that the Development Project site is located within an Oil Drilling District. Land uses permitted in the M2 zoning include most permitted uses in the M1 or MR2 zones that include industrial, storage, animal keeping and enclosed composting, among other uses.

Height District 1 does not specify maximum heights for development but establishes a maximum floor area ratio (FAR) of 1.5:1. The small portion of the Development Project site that encompasses the parcel along Exposition Boulevard is zoned PF-1XL. The "PF" zoning corresponds to the Development Project site's Public Facilities land use designation, and "1XL" represents the Height District. Public Facilities zoning allows for parking under freeways, fire and police stations, and joint public and private developments, among other uses. Under the PF zoning, there is no height restriction. Height District 1XL limits structures to two-stories and a maximum building height of 30 feet. Parcels within the Add Area Project site are zoned M2 and PF in the LAMC.

C. PROJECT CHARACTERISTICS

Background of the Development Project

The main portion of the Development Project site (Pico Parcel – 11122 through 11150 West Pico Boulevard) contains a concrete batch plant, which occupies approximately 66,300 square feet. The concrete batch plant has operated under different owners since before the 1930s. The property is currently leased to California Portland Cement Company, doing business as California Portland Cement. The second parcel (the "Sepulveda Parcel") is located at 2431 and 2441 South Sepulveda Boulevard. A third parcel encompasses approximately 45,200 square feet of land, which was originally used as the

office for the concrete batch plant. The third parcel was occupied by Sam's U-Drive occupied beginning in 1957 through the 1990s and is occupied by West Los Angeles Building Materials. An additional property, approximately 1.78 acres owned by Metro, is the subject of an Exclusive Negotiation Agreement (ENA) with Metro dated March 2011 to negotiate with the Project Applicant for use of this additional property in the Proposed Development Project; no land used are located on this property.

Proposed Development Project

The Proposed Development Project would require the demolition of all the existing structures that are currently located on the Development Project site. The Proposed Development Project would develop the site with a mixed-use commercial and residential development, with commercial access along Pico and Sepulveda Boulevards and residential access along Sepulveda and Exposition Boulevards. Part of the Metro railroad easement at the southern portion of the site, along Exposition Boulevard between Sepulveda Boulevard and Sawtelle Boulevard, is planned for use as rail-line-related infrastructure associated with Phase II of the Metro's Exposition Light Rail Transit Line (the "Expo Line"). The Phase II extension of the Expo Line will travel along the Exposition Boulevard corridor through the Development Project area, and will provide an above-grade station that crosses Sepulveda Boulevard with a station access point immediately adjacent to the Development Project site, near the intersection of Exposition Boulevard and Sepulveda Boulevard. Accordingly, the Proposed Development Project is designed as a transit-oriented development (TOD) that would fully maximize the potential synergies between neighborhood-serving commercial uses, larger retail uses, housing, and pedestrian, bus, and light rail transit. The Proposed Development Project would provide Expo Line passengers with pedestrian access to both existing and planned bus stops on both Pico and Sepulveda Boulevards. The Proposed Development Project would include a total of approximately ~~266,800~~160,000 square feet of retail commercial floor area and ~~538~~638 residential units (of which ~~59~~72 would be senior-affordable units), including ~~56~~68 studios, ~~262~~211 one-bedrooms, ~~201~~266 two-bedroom units, and ~~19~~21 three-bedroom units (approximately ~~518,764~~531,992 residential square feet). Table II-1, Proposed Revised Development Summary, provides a summary of the proposed uses.

Table II-1
Proposed Revised Development Summary

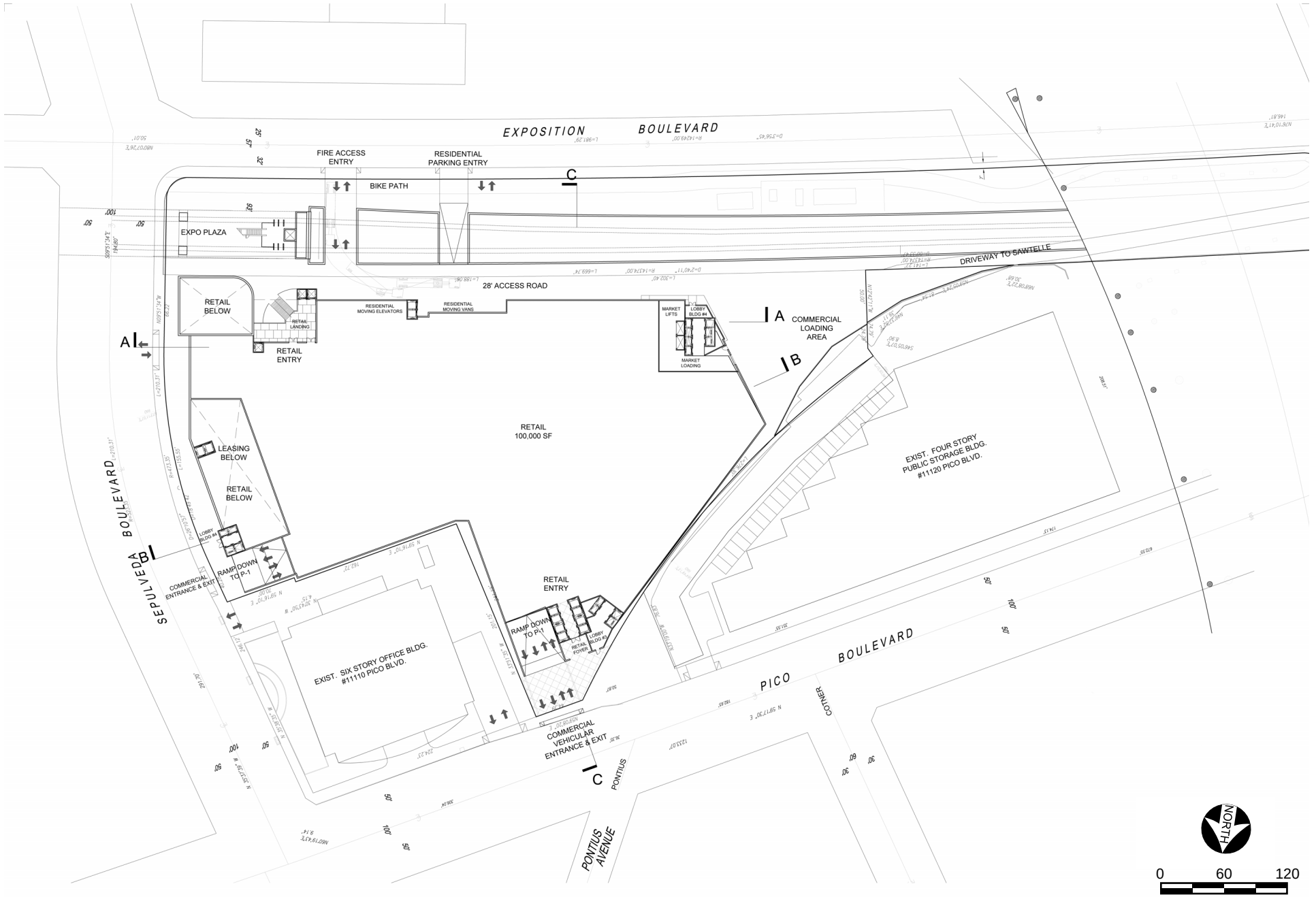
Land Use	Approximate Building Area
Market Rate Apartments	~~466,915~~487,532 square feet
Affordable Senior Units	~~42,849~~44,460 square feet
Corridors and Lobbies	84,572 square feet
Recreation Rooms	9,000 square feet
Retail	~~266,800~~160,000 square feet
Total	**785,564 square feet**
Source: Van Tilburgh Banvard and Soderbergh AIA, Site Plan, ~~October 2012~~January 2013.	

The Proposed Development Project would involve construction of four separate residential structures above ~~two~~one stories of commercial uses (refer to Figure II-3, Project Plot Plan; Figure II-4, ~~Ground Floor Retail, First Floor~~Composite Ground Level Plan; Figure II-5, ~~Second Level Retail, Second Floor~~First – Third Residential Level, Second – Fourth Floor~~; Figure II-6, First – Third Residential Levels, Third – Fifth Floors; Figure II-7, Fourth Residential Level, Sixth Floor; Figure II-8, Fifth Residential Level, Seventh Floor; Figure II-9, Sixth Residential Level, Eighth Floor; Figure II-10, Seventh Residential Level Ninth Floor; Figure II-11, Eighth – Twelfth Residential Level, Tenth – Fourteenth Floor; Figure II-12, Thirteenth Residential Level, Fifteenth Floor; Figure II-13, Fourteenth Residential Level Sixteenth Floor; Figure II-14, Fifteenth Residential Level, Seventeenth Floor; and Figure II-15, Residential Roofs~~). The ~~two~~one-story commercial component would be constructed above ~~five~~six levels of subterranean parking and would serve as the podium for the residential uses and associated open courtyard space and recreational facilities (Figure II-~~16~~6, First Subterranean Parking Level; Figure II-~~17~~7, Second Subterranean Parking Level; Figure II-~~18~~8, Third Subterranean Parking Level; Figure II-~~19~~9, Fourth Subterranean Parking Level; ~~and~~ Figure II-~~20~~10, Fifth Subterranean Parking Level; and Figure II-11, Sixth Subterranean Parking Level). The first floor of the Proposed Development Project would include a lobby fronting Pico Boulevard, the first floor of a major retail store, additional, retail space fronting Sepulveda Boulevard, and stock area for the market located on the second floor and a leasing office for the residences. The second floor of the Proposed Development Project would include the second floor of the major retail store, and an approximately ~~54,350~~50,000-square-foot market. The third floor of the Proposed Development Project would serve as the podium for the four residential structures, open courtyard space, and residential recreational facilities.

The two residential structures fronting on Sepulveda Boulevard would vary in height. The building in the southeastern corner of the Development Project site would house the senior-affordable residential units and would extend ~~four~~five and ~~five~~six stories above the ~~two~~one commercial levels (~~108~~86 feet above grade and ~~118~~96 feet above grade, respectively). The other residential structure fronting on Sepulveda Boulevard would extend ~~six~~eight and ~~seven~~nine stories above the ~~two~~one commercial levels, and the residential structure fronting on Pico Boulevard would extend ~~six~~eight and nine stories above the ~~two~~one commercial levels (approximately ~~114~~106 feet above grade), stepping back and up to ~~seven~~nine stories in height (approximately ~~124~~116 feet above grade) toward the interior of the Development Project site. The residential structure located in the western portion of the Development Project site would extend ~~15~~16 stories (approximately ~~200~~189 feet above ground surface) above the ~~two~~one commercial levels (refer to Figure II-~~21~~12, Sections AA and BB, and Figure II-~~22~~13, Section CC).

Simulations of the Development Project as seen from viewpoints near the Development Project site are depicted on Figures IV.B-8 through IV.B-12 in Section IV.B, Aesthetics (the revised figures are included in Attachment A to this Final EIR Errata). As shown, similar to the design described for the Development Project in the Draft EIR, the design of the Proposed Development Project is a mixture of contemporary and traditional architectural styles. The lower commercial levels of the Development Project would reflect

This page left blank intentionally.



Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-3
Project Plot Plan

This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-4
Composite Ground Level Plan

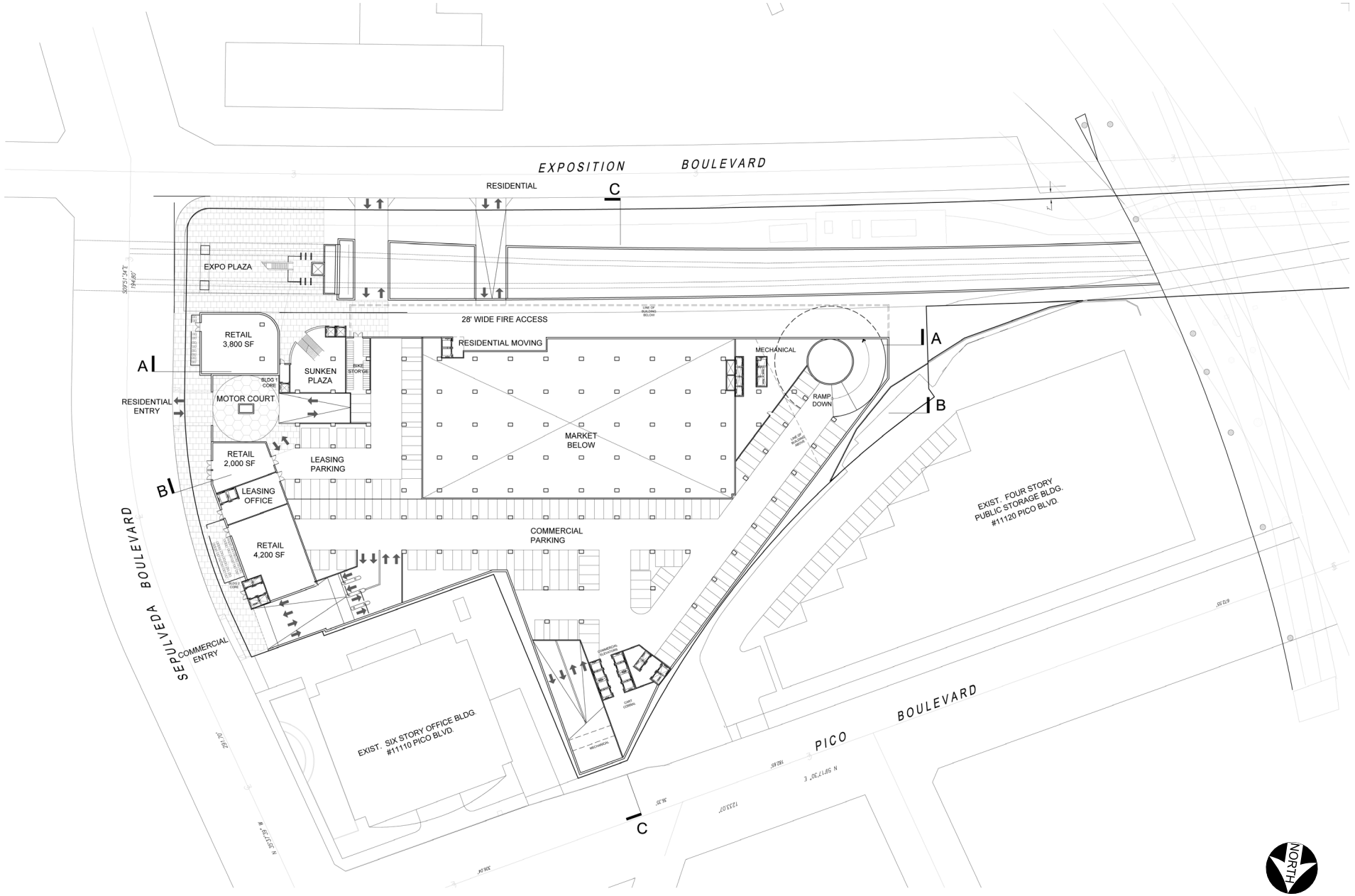
This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-5
First Thru Third Residential Level
Second Thru Fourth Floor

This page left blank intentionally.

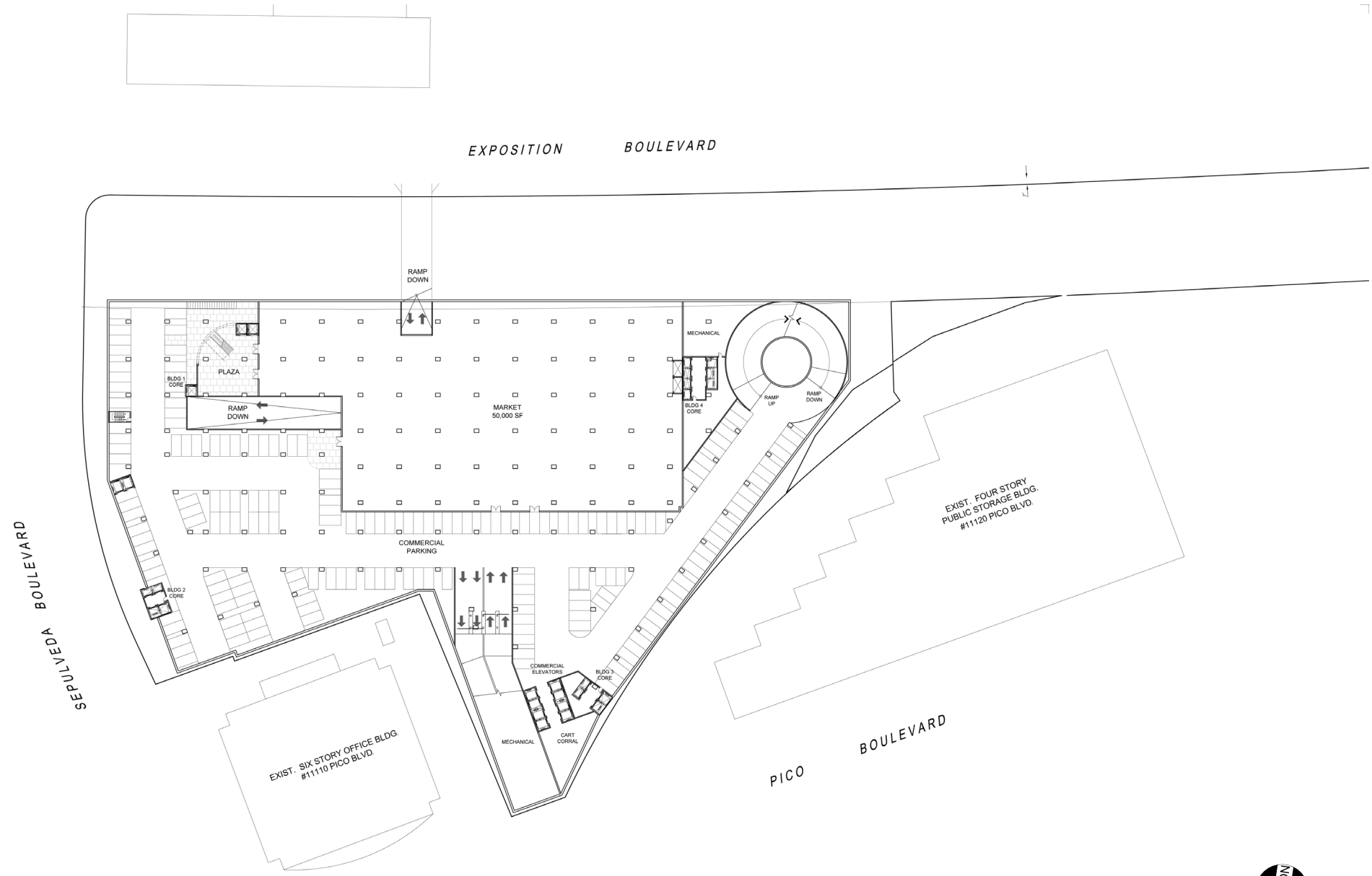


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-6
First Subterranean Level P-1

This page left blank intentionally.

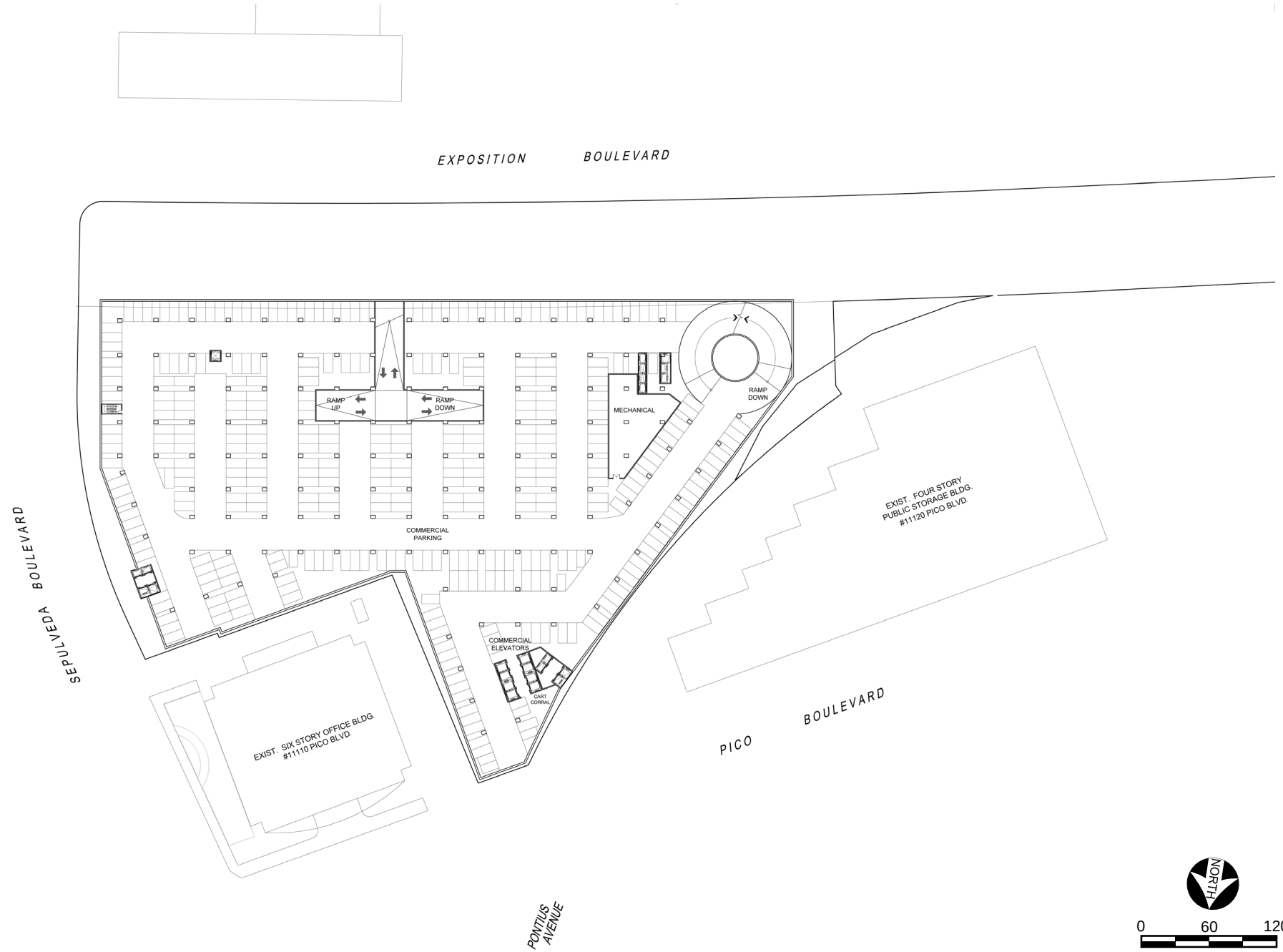


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-7
Second Subterranean Level P-2

This page left blank intentionally.

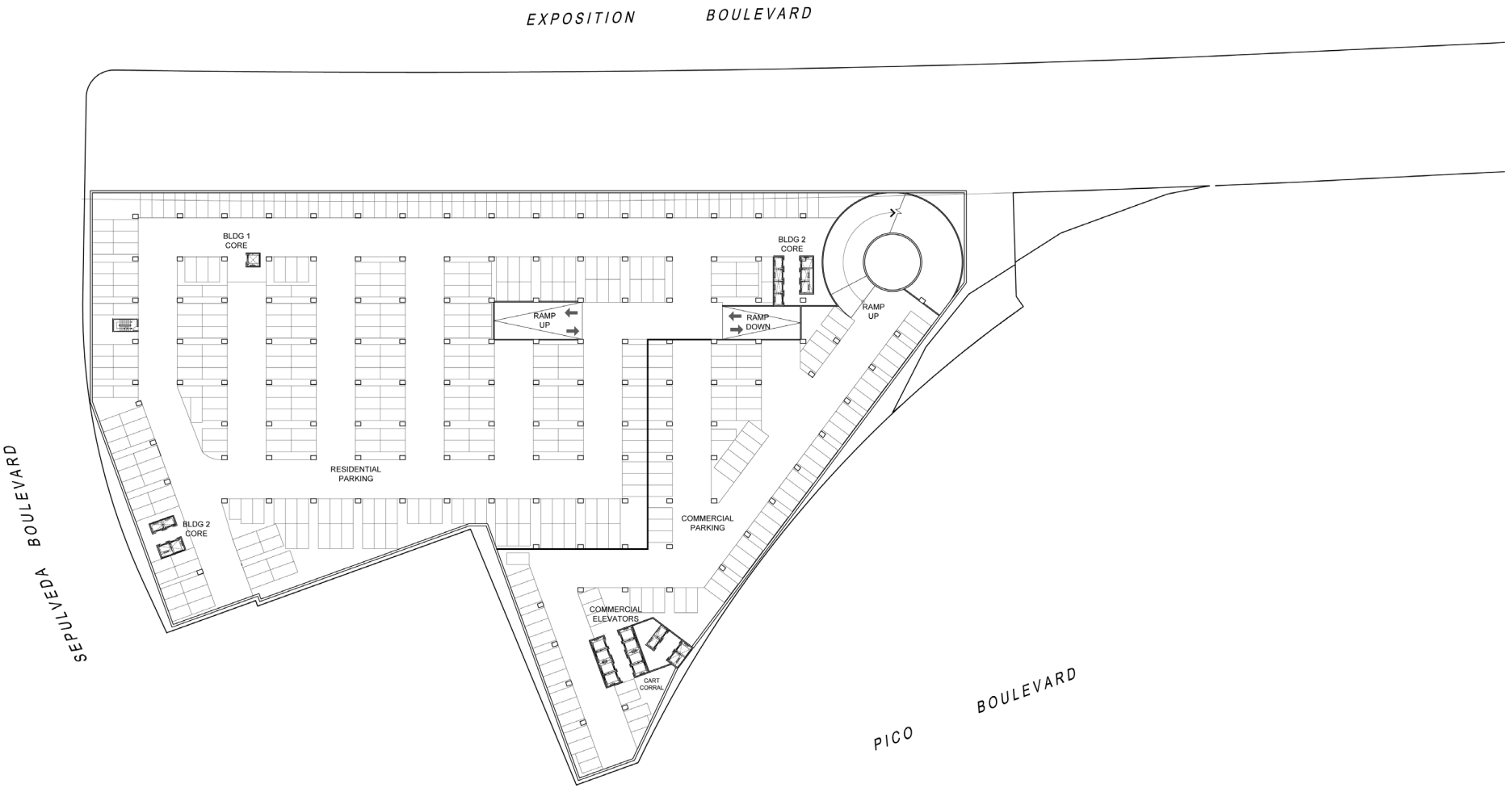


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-8
Third Subterranean Level P-3

This page left blank intentionally.

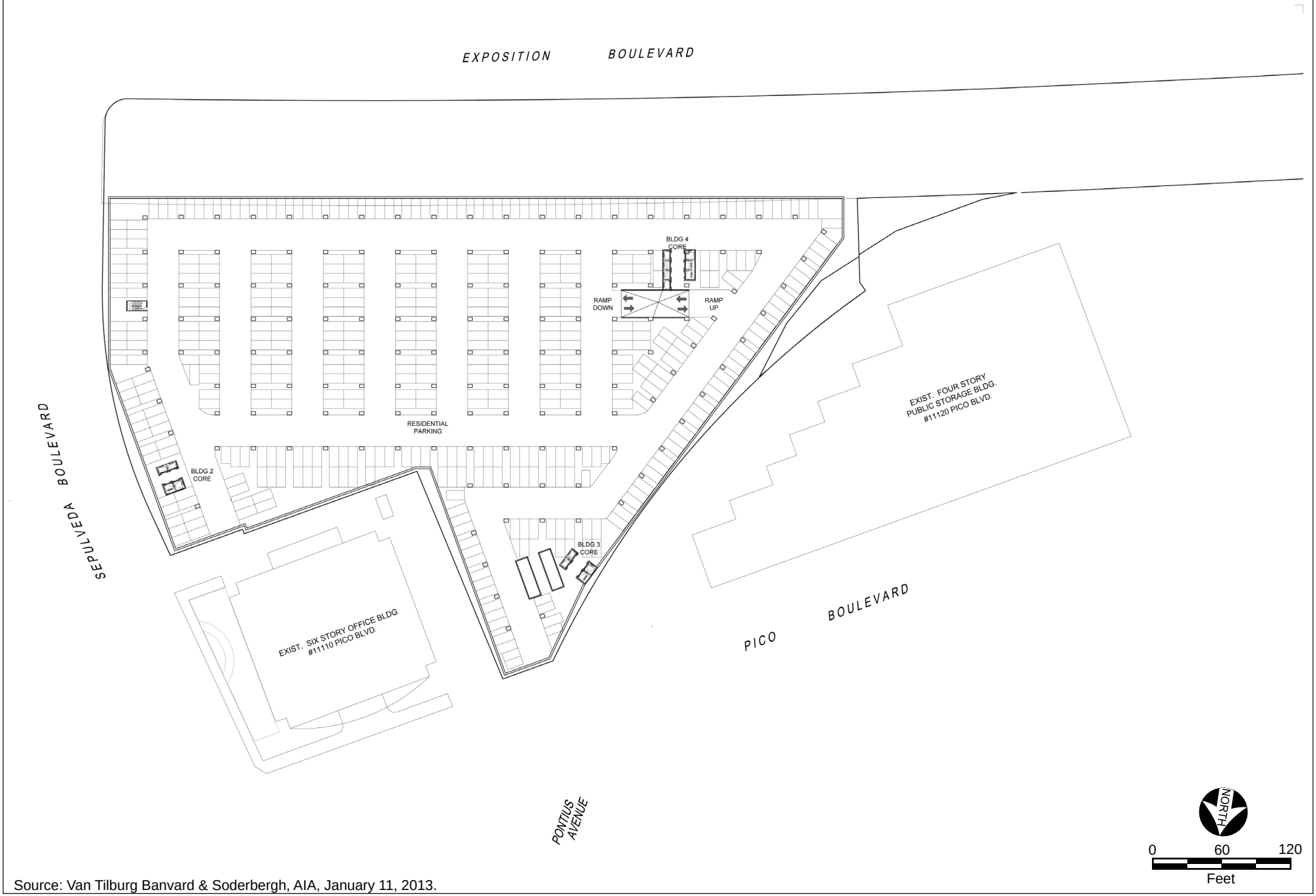


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-9
Fourth Subterranean Level P-4

This page left blank intentionally.

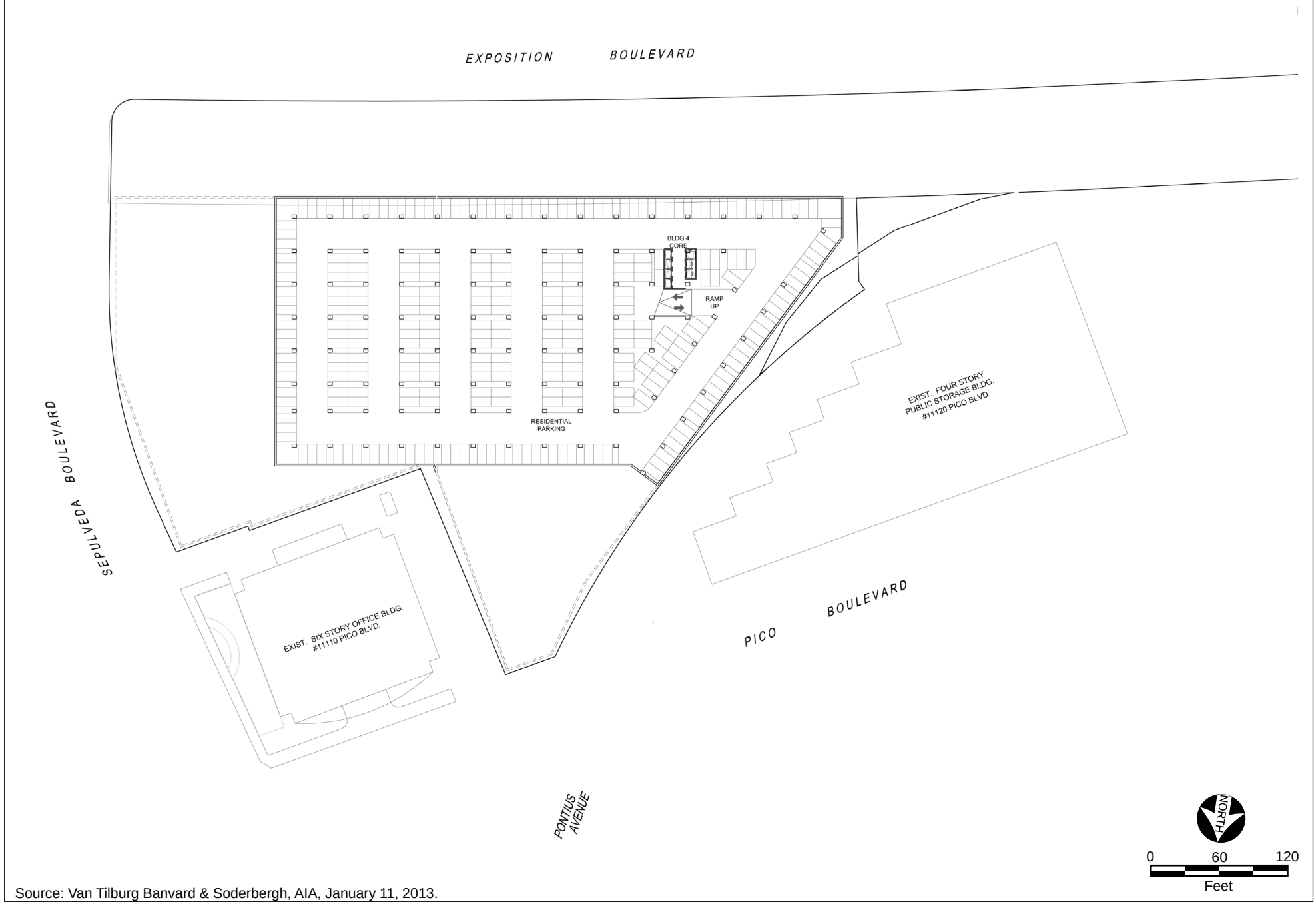


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-10
Fifth Subterranean Level P-5

This page left blank intentionally.

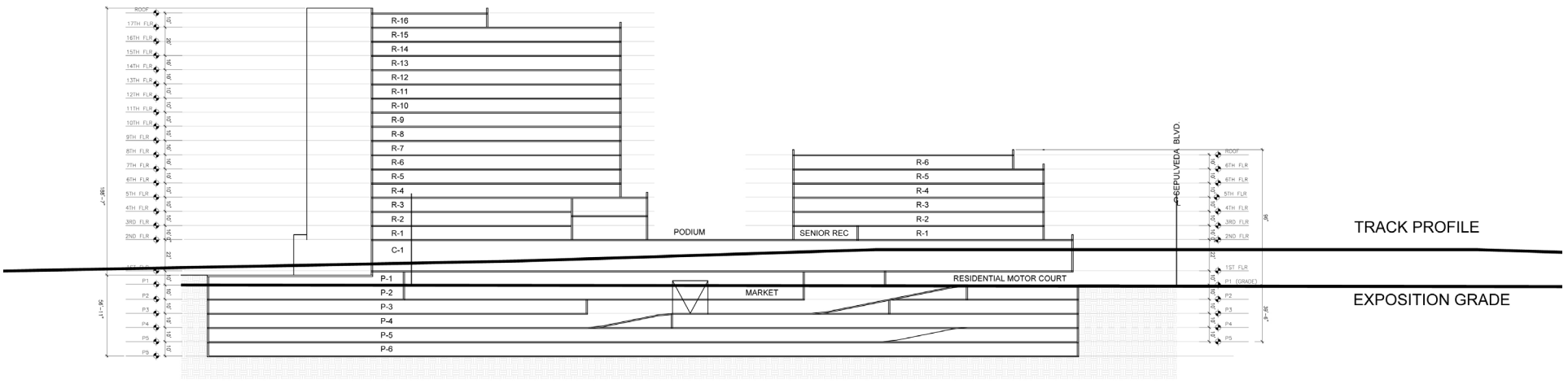


Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

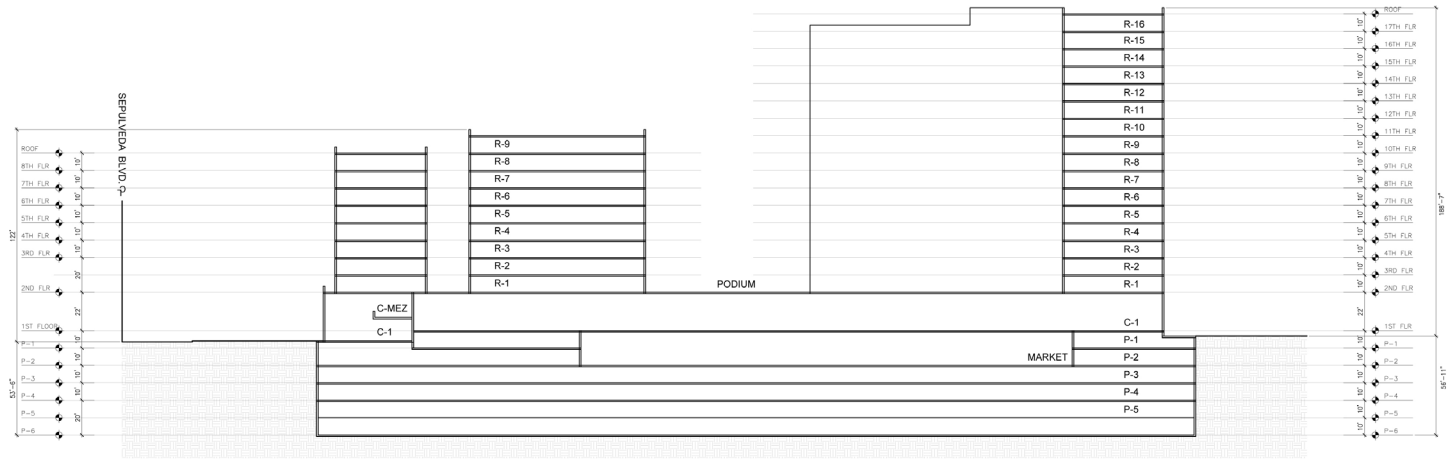
CAJA Environmental Services, LLC

Figure II-11
Sith Subterranean Level P-6

This page left blank intentionally.



SECTION AA



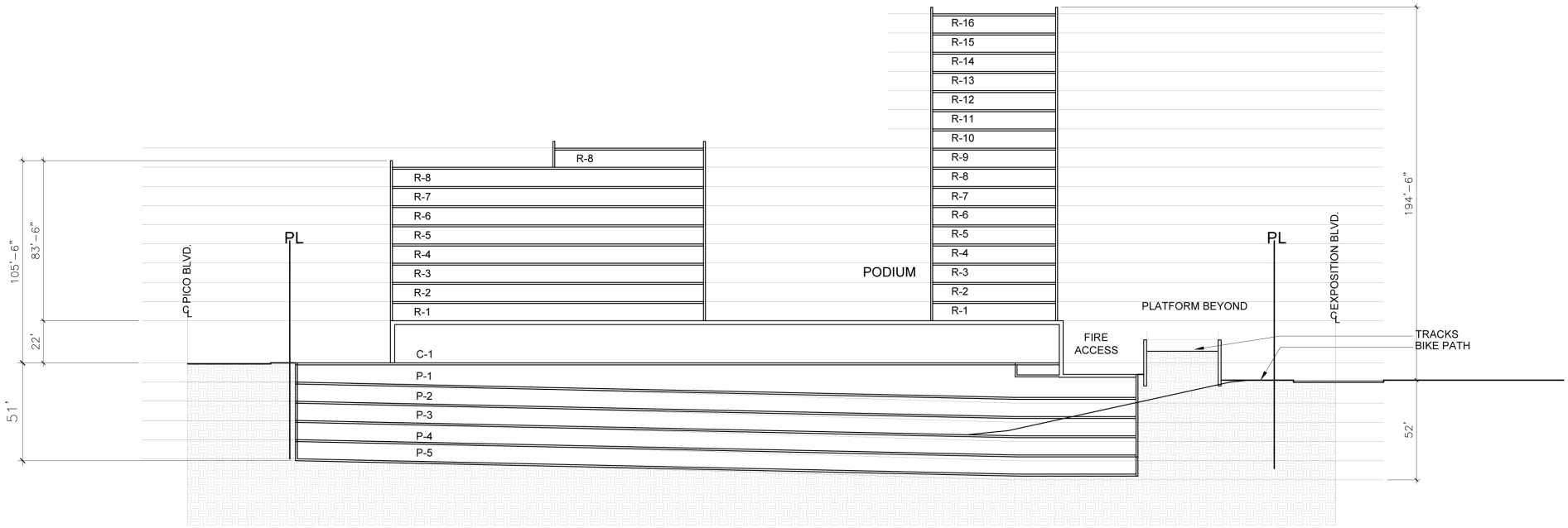
SECTION BB

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-12
Sections AA and BB

This page left blank intentionally.



SECTION CC

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-13
Section CC

This page left blank intentionally.

a more contemporary architectural style, with punched wall openings in a continuous façade, large glazed windows, and pedestrian-level openings, while the upper residential levels would reflect a more traditional architectural style, accentuated by balconies. The stepped and articulated elements of the design of the upper residential structures along Pico Boulevard and Sepulveda Boulevard would obscure the massing of the Development Project as a whole and the overall height, as viewed from a pedestrian level near the Project site (refer to Figures IV.B-8 through IV.B-12 in Section IV.B, Aesthetics).

Along Pico Boulevard and Sepulveda Boulevard, the building would be set back approximately 25 feet and 30 feet ~~(respectively)~~ from the roadways, allowing for development of publicly-accessible plaza areas (refer to Figure II-~~23~~14, Sepulveda Boulevard Pedestrian View A, Figure II-~~24~~15, Sepulveda Boulevard Pedestrian View B, Figure II-~~25~~16, Sepulveda Boulevard Pedestrian View C, and Figure II-~~26~~17, Pico Boulevard Pedestrian View). The setback areas would include widened sidewalks, a double row of trees, enhanced paving, drainage features, native plantings/landscaping, and a public art component. The plaza area along Sepulveda Boulevard would serve to enlarge the transit plaza and connect to the Development Project's smaller scale retail environment with neighborhood tenants and outdoor dining. ~~In addition, a portion of the second commercial level on Sepulveda Boulevard would be terraced to allow for additional outdoor dining and other uses.~~ The leasing office for the Development Project would also be on Sepulveda Boulevard, directly accessible from the street. The plaza areas would be designed to serve as a pedestrian "activation" function, by allowing sufficient room for pedestrian travel and by providing pedestrian-friendly access to key site entry points on Pico Boulevard and Sepulveda Boulevard and to the Expo Line station access point that will be developed adjacent to the Project site near the intersection of Sepulveda Boulevard and Exposition Boulevard.

The Proposed Development Project's four residential structures would be constructed in a traditional architectural style designed to complement the existing design of recent development in vicinity of the Project site and with other mid- and high-rise buildings in the greater Project area. The relationship between the taller buildings on the Development Project site to the surrounding existing single- and multi-family residential development is endemic to the West Los Angeles area and is consistent with other recent high-density developments.

The Proposed Development Project would also include amenities such as a recreation center and a landscaped common courtyard area (i.e., open space) between the residential buildings. Separate amenities specifically designed for the needs of the seniors would be provided as appropriate. The Proposed Development Project would include additional landscaping and a public water feature, as well as "green roofs" (refer to Figure II-~~27~~4~~, Ground Floor Street Scape, First Floor,~~ and Figure II-~~28~~5~~, Podium Landscape Plan, Third Floor~~).

This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-14
Sepulveda Boulevard Pedestrian View A

This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, Januaru 11, 2013.

CAJA Environmental Services, LLC

Figure II-15
Sepulveda Boulevard Pedestrian View B

This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-16
Sepulveda Boulevard Pedestrian View C

This page left blank intentionally.

Source: Van Tilburg Banvard & Soderbergh, AIA, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-17
Pico Boulevard Pedestrian View

This page left blank intentionally.

Parking and Access

Residential and commercial parking would be provided in five subterranean parking levels located below the development. A total of ~~1,067~~640 commercial stalls would be provided to accommodate the commercial retail uses. Residen~~tial~~ parking units would be segregated from the commercial parking spots. The residen~~tial~~ stalls would be provided at the rate of 0.5 stall per age-restricted unit, 1.0 stall per studio unit, 1.5 stalls per each one-bedroom unit, and 2.0 stalls per each two- and three-bedroom unit. A total of ~~827~~958 residen~~tial~~ parking stalls would be included in the Proposed Development Project and dedicated to residen~~tial~~ use~~s~~. The Proposed Development Project would also include the provision of an additional ~~135~~160 stalls for resident guest parking, which would be included with the commercial parking. In total, ~~2,029~~1,795 parking stalls would be provided for both residential and commercial uses combined.

The Proposed Development Project would provide parking in compliance with LAMC parking requirements (refer to Table II-2, Required and Provided Parking for the Proposed Revised Development Project). Vehicular access to residen~~tial~~ parking would be provided from Sepulveda and Exposition Boulevards, with ingress and egress located along both boulevards. Vehicular access to the commercial parking would be located from Pico and Sepulveda Boulevards, and commercial loading access would be provided by a loading entrance located on Exposition Boulevard, exi~~s~~ting on Sawtelle Boulevard.

Table II-2
Required and Provided Parking for the Proposed Revised Development Project

Use	Unit	Rate[a]	Number of Units/Square feet	Required Spaces	Provided Spaces
Residential Units	Studio	1 parking stall/unit	~~56~~68 units	~~56~~68	~~56~~68
	One-bedroom	1.5 parking stalls/unit	211 units	317	317
	Two- and Three-bedroom	2 parking stalls/unit	~~212~~287 units	~~424~~574	~~424~~574
	Senior Affordable	0.5 parking stall/unit	~~59~~72 units	~~30~~36	~~30~~36
	Guest Parking	0.25 parking stall/unit	~~538~~638 units	~~135~~160	~~135~~160
			Subtotal	***~~962~~1,155***	***~~962~~1,155***
Commercial	Retail	4 parking stalls/1,000 sf	~~266,800 sf~~ 160,000 sf	~~1,067~~ 640	~~1,067~~ 640
			Total	***~~2,029~~ 1,795***	***~~2,029~~ 1,795***

[a] *LAMC Section 12.21. General Provisions.*
Source: Van Tilburg, Banvard, & Soderbergh, 2012.

Add Area Project Site

The City has identified three properties bound by West Pico Boulevard to the north, South Sawtelle Boulevard to the west, Exposition Boulevard to the south, and Sepulveda Boulevard to the east that the City intends to re-designate from Light Industrial and Public Facilities to Community Commercial, land uses defined in the West Los Angeles Community Plan (the "WLA Community Plan"). These three properties are referred to as the "Add Area" in this EIR (refer to Figure II-~~29~~18, Aerial of the Development Project Site and Add Area Project Site). The purpose of the re-designation is to provide for logical, consistent area-wide planning and uniform land use designations within the Project area. Thus, in addition to the discretionary approvals required for the specific development proposal put forth by the Applicant of the Development Project, this EIR also addresses the General Plan Amendment related to re-designation of Add Area Project site.

The City does not propose rezoning of the Add Area Project site at this time; any future rezoning would be requested by individual applicants at the time a specific project is proposed to the City. The existing industrial zoning of the Add Area Project site is less restrictive than the land use designation now proposed, as the requested General Plan Amendment to Community Commercial would preclude future industrial uses permitted in the Light Industrial land use category from establishing in this area. The Community Commercial land use designation allows for development of land uses that provide goods and services that appeal to both local and regional markets and includes such uses as restaurants, shopping centers, recreational facilities, hotels, and multi-family residential uses. Specifically, the following zoning designations are compliant with the Community Commercial land use designation:

- CR (Limited Commercial Zone)
- C2 (Commercial Zone)
- C4 (Commercial Zone)
- RAS3 (Residential/Accessory Services Zone Purpose Statement)
- RAS4 (Residential/Accessory Services Zone Purpose Statement)
- P (Automobile Parking Zone)
- PB (Parking Building Zone)

Within the Community Commercial land use designation all development is limited to Height District No. 1. As previously discussed, pursuant to LAMC Section 12.21.1(A)(1), Height District No. 1 allows a maximum FAR of 1.5:1. There is no height limit for structures within Height District 1. Pursuant to LAMC Section 12.14(C), within the C2 zone, front yard setbacks are not required. Furthermore, side and rear yard setbacks are not required for buildings that are used exclusively for commercial purposes.

Source: Van Tilburg Banvard & Soderbergh, AIA and CAJA Environmental Services, LLC, January 11, 2013.

CAJA Environmental Services, LLC

Figure II-18
Aerial of the Development
and Add Area Project Site

This page left blank intentionally.

For the purposes of this EIR, it is assumed that for the foreseeable future, the existing uses on the Add Area Project site (i.e., public storage facility, a County office building, and a maintenance yard) would continue. The characteristics of any future development associated with the Add Area Project would be developed at the time than an individual applicant proposes a project to the City. Therefore, at this time no project-level design characteristics are included for the Add Area Project.

D. PROJECT OBJECTIVES

The objectives for the Proposed Development Project are as follow:

- To create a high-quality mixed-use development that promotes integrated urban living and furthers SCAG goals of addressing regional housing needs through the development of infill sites;
- To replace uses that are incompatible with mass transit with uses that are complementary to the proposed development of a light rail station and Metro Rapid public transit;
- To address traffic issues on a regional level by increasing density near major mass transit nodes;
- To fully utilize a site consistent with the goals and policies in the WLA Community Plan;
- To construct a development that enhances pedestrian circulation, incorporates high-quality landscaping and aesthetics, and creates a more beautiful and livable neighborhood environment;
- To maximize the City's affordable housing stock and increase the provision of Senior Low Income and/or Very Low Income housing, thus helping to address the City's existing affordable housing shortage;
- To provide affordable housing for seniors in a highly desirable, select part of the City;
- To diversify the housing stock in West Los Angeles, and improve the West Los Angeles job-housing balance by maximizing affordable and/or workforce housing development;
- To reduce vehicle miles traveled by constructing retail amenities closer to existing consumers;
- To increase jobs through construction and operation of a new mixed-use development;
- To generate tax revenue for the City with high tax-generating land uses;

- To provide a mixed-use development that is compatible and complementary with surrounding land uses; and

- To provide adequate parking facilities to serve the proposed residential and retail uses.

E. DISCRETIONARY ACTIONS

The City Planning Department is the Lead Agency for the Proposed Development and Add Area Projects. ~~Implementation of~~The Applicant for the Proposed Development Project would ~~require~~requests approval of the following discretionary actions:

- General Plan Amendment to re-designate the entire Development Project site as Community Commercial;

- Rezone of the Development Project site (excluding the Add Area) to C2-1;

- Affordable Housing Development Incentive to Permit Increase in Maximum Allowable FAR of 3:1;

- Conditional Use Permit to allow for the sale of alcoholic beverages for off-site consumption;

- Development Agreement;

- Site Plan Review;

- Vesting Tentative Tract Map to separate the commercial and residential uses on-site;

- Variance from Sections 12.21.1.3.a and b of the LAMC to allow any roof structure to extend above the height limit established for this project, including but not limited to stairway enclosures, elevator overrides and mechanical equipment or screens of any type;

- Variance from 12.14.C.2 under the C2 zone that requires buildings erected for residential purposes to adhere to the side and rear yard requirements of the R4 Zone (section 12.11 C.2 and 3) that reduces all required yards to zero feet;

- Haul route approval; and

- Approval from the California Public Utilities Commission of encroachments to the Sepulveda Boulevard/Exposition Boulevard intersection crossing.

Implementation of the Proposed Add Area Project would require approval of a General Plan Amendment to re-designate the Add Area Project site as Community Commercial;

In addition to these discretionary actions, other ministerial permits could be necessary to implement the Proposed Development Project.

This EIR serves as an advisory document, compliant with CEQA, intended to offer additional guidance to the Lead Agency for all discretionary actions associated with the Proposed Development Project. This EIR is also intended to cover all state, regional, and/or local government discretionary approvals that could be required in conjunction with the Proposed Development Project, whether or not they are explicitly listed. Federal, state, and regional agencies that may have jurisdiction over specific activities associated with the Proposed Development Project include, but are not necessarily limited to the following:

- Metro
- South Coast Air Quality Management District
- Regional Water Quality Control Board, Los Angeles Region

This page left blank intentionally.

ADDITIONAL ANALYSIS

SECTION IV (ENVIRONMENTAL IMPACT ANALYSIS)

Aesthetics

Visual Quality/Character

Construction

As discussed in Section IV.B (Aesthetics) of the Draft EIR, although various project construction activities would negligibly reduce the existing visual attributes of the Development Project site for the duration of the period, due to the existing low visual quality of the Development Project site and the temporary nature of construction, construction activities would not substantially degrade or eliminate the existing aesthetic image of the surrounding area, or generate substantial long-term contrast with the visual character of the surrounding area. Visual quality/character impacts associated with construction of the Development Project were found to be less than significant in the Draft EIR.

The Revised Development Project would include development of the same site and result in the same types of construction activities over the same construction period as discussed in the Draft EIR. Thus, the less than significant construction-related visual quality/character impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Operation

As discussed in Section IV.B (Aesthetics) of the Draft EIR, the Development Project site is situated in a highly urbanized area characterized by a mix of industrial, commercial, and retail uses and low- to mid-density residential uses. The visual character of the Development Project area is not defined by one or a limited number of character-defining features (such as design, architecture, land uses, or massing) but comprises a mélange of design, architecture, land uses, and massing that is typical of more recent development along boulevards in West Los Angeles. The Development Project site itself is currently developed with industrial land uses and is surrounded by a mix of commercial and residential land uses. The Development Project would change the land uses on the Development Project site from industrial to a mix of commercial and residential. Although the visual character of the Development Project site and surrounding area would change as a result of the Development Project and buildings at the Development Project would be visible from off-site locations, the change and visibility would not constitute a substantial degradation to the visual character of the site and surrounding area. Impacts of the Development Project related to visual character were found to be less than significant in the Draft EIR.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the design, architecture, and massing of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Also, the overall heights of the buildings under the Revised Development Project would be shorter. For these reasons, the less than significant visual quality/character impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Views and View Corridors

As discussed in Section IV.B (Aesthetics) of the Draft EIR, although the Development Project would be visible from portions of public areas such as Pico, Sepulveda, and Exposition Boulevards, residential streets to south, and the elevated San Diego Freeway structure, it would not obstruct any scenic views (e.g., ocean, mountains, coastline), because such scenic views do not existing from the Development Project site area. Impacts relative to public scenic views were found to be less than significant in the Draft EIR.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the design, architecture, and massing of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Also, the overall heights of the buildings under the Revised Development Project would be shorter. Further, as stated previously, no scenic views are available from the project site area. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

View Obstruction

As discussed in Section IV.B (Aesthetics) of the Draft EIR, minimal views of the Santa Monica Mountains are available from the elevated San Diego and Santa Monica Freeways within the Development Project site area. However, the Development Project would not block any scenic vistas, including views of the Santa Monica Mountains. Impacts related to view obstruction associated with the Development Project were found to be less than significant in the Draft EIR.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the design, architecture, and

massing of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Also, the overall heights of the buildings under the Revised Development Project would be shorter. For these reasons, no new or increased significant impacts beyond those already identified in the Draft EIR related to this issue would occur as a result of the Revised Development Project.

Shade/Shadow

As discussed in Section IV.B (Aesthetics) of the Draft EIR, shadows cast by the Development Project would not exceed the City's significance thresholds for shadow impacts, and no significant impacts related to shade/shadow were identified for the Development Project in the Draft EIR. Because the Revised Development Project includes development of the same site identified for the Development Project in the Draft EIR with the same configuration of buildings but shorter building heights, the Revised Development Project would not cast shadows in excess of the City's significance thresholds. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Light and Glare

Construction

As discussed in Section IV.B (Aesthetics) of the Draft EIR, no light sensitive land uses are located directly adjacent to the Development Project site. Also, construction activities would occur primarily during daylight hours, and any construction-related illumination would be used for safety and security purposes only, in compliance with the Los Angeles Municipal Code (LAMC) light intensity requirements. Additionally, construction lighting would be temporary. Further, construction activities would result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Impacts related to light and glare associated with the construction of the Development Project were found to be less than significant.

The Revised Development Project would include development of the same site and result in the same types of construction activities over the same construction period as discussed in the Draft EIR. Thus, the less than significant construction-related light and glare impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Operation

As discussed in Section IV.B (Aesthetics) of the Draft EIR, most of the exterior of the residential buildings would be comprised of decorative, non-reflective glass associated with the residential windows.

On-site lighting would be designed to accent the architectural features of the Development Project and would be located on the building facades to highlight the architectural design and landscaping. The Development Project would also potentially require the replacement of streetlights or installation of decorative luminaries for pedestrian security. All street and pedestrian lighting would be coordinated with the City's Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing errant light spillover. The Development Project would be required to comply with LAMC Sec. 93.0117(b) which would preclude the Development Project's exterior light sources and building materials from causing more than two foot-candles of lighting intensity or generating direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. Impacts related to light and glare associated with operation of the Development Project were found to be less than significant in the Draft EIR.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the design, architecture, and massing of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR but with shorter building heights. The amount of light and glare-potentially surfaces under the Revised Development Project would be approximately the same as under the Development Project described in the Draft EIR. Thus, the less than significant light and glare impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Air Quality

Construction

Regional Air Quality

As discussed in Section IV.C (Air Quality) of the Draft EIR, construction of the Development Project would result in regional pollutant emissions in excess of the South Coast Air Quality Management District's (SCAQMD) significance thresholds for ROG and NOx emissions, and impacts related to these pollutant emissions associated with construction of the Development Project were found to be significant and unavoidable in the Draft EIR (refer to Table A).

Table A
Estimated Peak Daily Construction Emissions (with Mitigation) – Revised Development Project

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase						
Fugitive Dust	--	--	--	--	0.18	0.00
Off-Road Diesel	15.48	37.22	27.72	0.05	1.84	1.64
Hauling	0.17	1.68	1.01	0.00	1.13	0.08
Worker Trips	0.12	0.13	1.25	0.00	0.21	0.01
Revised Project Total Emissions	***15.77***	***39.03***	***29.98***	***0.05***	***3.36***	***1.73***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Proposed Project Total Emissions	***17.61***	***36.45***	***27.01***	***0.04***	***3.17***	***1.56***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Site Grading/Excavation Phase						
Fugitive Dust	--	--	--	--	0.10	0.01
Off-Road Diesel Equipment	13.45	30.26	24.35	0.04	1.71	1.52
Hauling	19.99	197.88	119.12	0.20	14.57	9.38
Worker Trips	0.17	0.18	1.73	0.00	0.28	0.02
Revised Project Total Emissions	***33.61***	***228.32***	***145.20***	***0.24***	***16.66***	***10.93***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	Yes	No	No	No	No
Proposed Project Total Emissions	***33.61***	***228.32***	***145.20***	***0.24***	***16.66***	***10.93***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	Yes	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	10.88	42.96	32.09	0.06	2.53	2.25
Building Construction Vendor Trips	1.96	20.00	14.28	0.02	1.59	0.79
Building Construction Worker Trips	4.40	4.72	45.00	0.06	8.10	0.55
Architectural Coatings	57.94	--	--	--	--	--
Architectural Coatings Off-Road Diesel Equipment	0.91	5.48	5.00	0.01	0.52	0.46
Architectural Coatings Worker Trips	0.81	0.86	8.23	0.01	1.62	0.11
Paving Off-Road Diesel Equipment	0.80	4.78	5.90	0.01	0.48	0.43
Paving Worker Trips	0.04	0.04	0.40	0.00	0.08	0.01
Revised Project Total Emissions	***77.74***	***78.84***	***110.90***	***0.17***	***14.92***	***4.60***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	Yes	No	No	No	No	No
Proposed Project Total Emissions	***90.54***	***68.71***	***109.07***	***0.18***	***13.99***	***4.31***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	Yes	No	No	No	No	No

Source: Parker Environmental Consultants, January 2013. Calculation sheets are provided in Attachment B.

The Revised Development Project would be the same in overall size to the Development Project described in the Draft EIR. As such, the construction assumptions for the Revised Development Project are assumed to be generally the same as the Development Project described in the Draft EIR, including

the construction schedule, demolition volume, soil export, and mitigation measures applied to the Development Project described in the Draft EIR. As shown on Table A, the Revised Development Project would result in significant and unavoidable impacts for NO_x during the site grading/excavation phase and ROG during the building construction phase. These impacts are would be the same or less than impacts under the Development Project described in the Draft EIR, although it should be noted that because the Revised Development Project has shifted more square footage to residential uses and away from commercial uses, some specific impact areas have also shifted accordingly. One such example is the ROG emissions for the building construction phase. As shown on Table A, the ROG emissions would be slightly reduced under the Revised Development Project, because the VOC application rate for residential construction is reduced compared to the VOC application rate for non-residential construction. Nevertheless, it can be concluded that impacts under the Revised Development Project would be considered significant and unavoidable, similar to the impacts under the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Local Air Quality

As discussed in Section IV.C (Air Quality) of the Draft EIR, with implementation of Mitigation Measure C-2 (limits on construction-engine combustion standards), localized pollutant emissions impacts associated with construction of the Development Project were found to be less than significant in the Draft EIR (refer to Table B).

As shown in Table B, similar to the Development Project described in the Draft EIR, Mitigation Measures C-1 and C-2 would ensure the Revised Development Project's on-site construction impacts would be less than significant. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Operation

Regional Air Quality

As discussed in Section IV.C (Air Quality) of the Draft EIR, operation of the Development Project would result in regional pollutant emissions in excess of the SCAQMD significance thresholds for ROG, NOx, and CO emissions, and impacts related to these pollutant emissions associated with construction of the Development Project were found to be significant and unavoidable in the Draft EIR (refer to Table C).

Table B
Localized On-Site Peak Daily Construction Emissions (with Mitigation) – Revised Development Project

Construction Phase[a]	Total On-site Emissions (Pounds per Day)			
	NO_x[b]	CO	PM_{10}	$PM_{2.5}$
Revised Development Project Demolition Emissions	**37.22**	**27.72**	**2.02**	**1.64**
SCAQMD Localized Thresholds (1.5 acres)	68.82	692.75	5.02	3.48
Potentially Significant Impact?	*No*	*No*	*No*	*No*
Proposed Development Project Demolition Emissions	**37.22**	**27.72**	**2.02**	**1.64**
SCAQMD Localized Thresholds (1.5 acres)	68.82	692.75	5.02	3.48
Potentially Significant Impact?	*No*	*No*	*No*	*No*
Revised Development Project Grading Emissions	**30.26**	**24.35**	**1.81**	**1.53**
SCAQMD Localized Thresholds (2.0 acres)	81.67	827.00	6.00	4.00
Potentially Significant Impact?	*No*	*No*	*No*	*No*
Proposed Development Project Grading Emissions	**30.26**	**24.35**	**1.81**	**1.53**
SCAQMD Localized Thresholds (2.0 acres)	81.67	827.00	6.00	4.00
Potentially Significant Impact?	*No*	*No*	*No*	*No*
Revised Development Project Building Construction Emissions	**53.22**	**42.99**	**3.53**	**3.14**
SCAQMD Localized Thresholds (2.0 acres)	81.67	827.00	6.00	4.00
Potentially Significant Impact?	*No*	*No*	*No*	*No*
Building Construction Emissions	**53.22**	**42.99**	**3.53**	**3.14**
SCAQMD Localized Thresholds (2.0 acres)	81.67	827.00	6.00	4.00
Potentially Significant Impact?	*No*	*No*	*No*	*No*

[a] *The localized thresholds for all construction activities are based on a receptor distance of 82 feet in SCAQMD's SRA 2. As needed, thresholds were calculated based on the linear regression methodology recommended by the SCAQMD and Fact Sheet for Applying CalEEMod to LSTs, SCAQMD.*

[b] *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

Source: Parker Environmental Consultants, January 2013. Calculation sheets are provided in Attachment B.

As detailed in the Modified Project Traffic Study (refer to Attachment C), the Revised Development Project would generate a total of approximately 10,714 total daily trips, or 9,953 net site daily trips. This represents a reduction in net site-related trips of 3,760 daily trips (approximately 27.4 percent) compared to the 13,713 daily trips produced by the Development Project described in the Draft EIR. Also detailed in the Modified Project Traffic Study and similar to the Development Project described in the Draft EIR, the Revised Development Project would include transit-oriented design (TOD) reductions and also trip reductions associated with the proposed Transportation Demand Management (TDM) program. Specifically, with these trip for the Revised Project, daily trips for the residential component would be reduced by 602 trips, daily trips for the anchor retail component would be reduced by 381 trips, and the daily trips for the supermarket and local-serving retail would be reduced by 329 trips. In total, the TOD and TDM measures would reduce daily trips for the Revised Development Project by a total of 1,312

Table C
Estimated Future Daily Operational Emissions (with TOD/TDM) – Revised Development Project

Emissions Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Summertime (Smog Season) Emissions						
Future With Revised Development Project Emissions						
Natural Gas Usage	0.25	2.19	1.07	0.01	0.18	0.18
Landscape Maintenance Equipment	1.89	0.66	55.37	0.00	0.29	0.29
Consumer Products	15.80	-	-	-	-	-
Hearth	1.11	0.00	0.06	0.00	0.77	0.76
Architectural Coatings	2.38	-	-	-	-	-
Mobile (Vehicle) Sources	53.19	126.92	524.02	0.75	83.97	7.70
Total Revised Development Project Emissions	*74.62*	*129.77*	*580.52*	*0.76*	*85.21*	*8.93*
Less Existing Project Site Emissions	*7.84*	*14.53*	*59.94*	*0.07*	*10.07*	*0.81*
Total Revised Development Project Net Emissions	**66.78**	**115.24**	**520.58**	**0.69**	**75.14**	**8.12**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**Yes**	**Yes**	No	No	No	No
Total Proposed Development Project Net Emissions	***103.91***	***200.66***	***866.31***	***1.19***	***129.94***	***13.01***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**Yes**	**Yes**	**Yes**	No	No	No
Wintertime (Non-Smog Season) Emissions						
Future With Revised Development Project Emissions						
Natural Gas Usage	0.25	2.19	1.07	0.01	0.18	0.18
Landscape Maintenance Equipment	1.89	0.66	55.37	0.00	0.29	0.29
Consumer Products	15.80	-	-	-	-	-
Hearth	1.11	0.00	0.06	0.00	0.77	0.76
Architectural Coatings	2.38	-	-	-	-	-
Mobile (Vehicle) Sources	56.43	137.49	523.48	0.71	84.02	7.75
Total Revised Development Project Emissions	*77.86*	*140.34*	*579.98*	*0.72*	*85.26*	*8.98*
Less Existing Project Site Emissions	*8.26*	*15.79*	*59.93*	*0.07*	*10.07*	*0.82*
Total Revised Development Project Net Emissions	**69.60**	**124.55**	**520.05**	**0.65**	**75.19**	**8.16**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**Yes**	**Yes**	No	No	No	No
Total Proposed Development Project Net Emissions	***108.85***	***216.88***	***869.27***	***1.11***	***130.02***	***13.09***
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	**Yes**	**Yes**	**Yes**	No	No	No

Source: Parker Environmental Consultants, January 2013. Calculation sheets are provided in Attachment B.

trips. Thus, for a meaningful comparison to the mitigated impacts under the Development Project described in the Draft EIR, the Revised Development Project's regional operational air quality impacts have been estimated based on a daily trip total of 9,402 total trips, or 8,641 net site trips. As shown on Table C, the TOD/TDM scenario for the Revised Development Project would exceed the established

SCAQMD threshold levels for ROG and NO_x during both the summertime and wintertime seasons. However, when compared to the Development Project described in the Draft EIR, the Revised Development Project would substantially reduce the overall ROG and NO_x emissions, and the Revised Development Project would eliminate the CO significant impact that occurred under the Development Project described in the Draft EIR. As such, regional operational impacts under the Revised Project would be considered significant and unavoidable, but these impacts would be substantially reduced compared to the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Localized CO

As discussed in Section IV.C (Air Quality) of the Draft EIR, under the Development Project, future 1-hour and 8-hour CO concentrations near the study intersections would not exceed their respective national or state ambient air quality standards (i.e., the national 1-hour CO ambient air quality standard is 35.0 ppm, and the state 1-hour CO ambient air quality standard is 20.0 ppm; the 8-hour national and state standards for localized CO concentrations are 9.0 ppm). Therefore, implementation of the Development Project would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) located directly proximate to these intersections to substantial localized pollutant concentrations. Impacts with respect to the exposure of sensitive receptors to substantial pollutant concentrations associated with the Development Project were found to be less than significant in the Draft EIR.

Because the Revised Development Project would generate fewer peak-hour traffic trips than the Development Project described in the Draft EIR, the amount of localized CO pollutant emissions generated by the Revised Development Project would be less than that generated under the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

AQMP Consistency

As discussed in Section IV.C (Air Quality) of the Draft EIR, the Development Project would not generate long-term localized operational emissions in excess of SCAQMD's significance thresholds for criteria pollutants. In addition, because the SO_2 emissions would be negligible during Development Project operations, a violation of the SO_2 ambient air quality standard would not occur as a result of the Development Project. Overall, because none of the criteria pollutant concentrations would exceed the SCAQMD's on-site operational significance thresholds at off-site receptors in proximity to the Development Project site, the Development Project meets the first criterion (of two criteria) for determining Development Project consistency with the 2007 AQMP. With regard to the second criterion, projects that are consistent with the regional population, housing, and employment forecasts identified by

SCAG are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. As discussed in Section IV.K (Population, Housing, and Employment) of the Draft EIR, the population, housing, and employment associated with the Development Project would be consistent with population, housing, and employment projections for the West Los Angeles Community Plan area and the City of Los Angeles. For these reasons, the Development Project would be consistent with the underlying assumptions of the SCAQMD's 2007 AQMP, would not cause or worsen an exceedance of an ambient air quality standard, and the Development Project would be consistent with that plan. Impacts under the Development Project related to consistency with the AQMP were found to be less than significant.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. As discussed previously, the Revised Development Project also would not generate localized operational CO emissions in excess of SCAQMD's on-site operational significance thresholds at off-site receptors in proximity to the Development Project site. Further, as discussed later in this section (refer to the subheading "Population, Housing, and Employment"), the population, housing, and employment associated with the Revised Development Project also would be consistent with projections for the West Los Angeles Community Plan area and the City of Los Angeles. Thus, for these reasons, the Revised Development Project also would be consistent with the AQMP. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Consistency with Air Quality Element

Consistency of the Development Project with the applicable policies of the City's General Plan Air Quality Element is included on Table IV.C-14 on page IV.C-109 in Section IV.C (Air Quality) of the Draft EIR. As discussed, the Development Project would be consistent with all of the applicable policies of the Air Quality Element, and no significant impacts related to this issue were identified for the Development Project in the Draft EIR.

Because the Revised Development Project is only changing the amount of commercial land use square footage and the number of residential dwelling units and because the number of daily and peak-hour traffic trips would be reduced when compared to the Development Project described in the Draft EIR, the consistency discussion included on Table IV.C-14 applies equally to the Revised Development Project, and the Revised Development Project would be consistent with the applicable policies of the Air Quality Element. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Wind

As discussed in Section IV.C (Air Quality) of the Draft EIR, the Development Project would alter the wind speeds measured around the perimeter of the Development Project site. A number of areas on the Development Project site would experience decreased wind speeds, some reduced significantly. These areas would include the commercial parking ingress and egress and sidewalk along Sepulveda Boulevard. Roof wind speeds would be high, but such impacts would not be significant as no occupant uses are proposed at the roof level. There would be locally breezy points at the podium level. Based on the stability of the wind speeds in the existing and proposed conditions or the shielding from adjacent buildings, the Development Project site would not cause wind speeds to exceed the significance threshold of 7 mph. For these reasons, no significant impacts related to wind were identified for the Development Project in the Draft EIR.

The Revised Development Project includes development of the same site with structures that are similar in configuration (i.e., four residential structures over a commercial structure and subterranean parking) and massing but somewhat shorter in height. The wind impact conditions described for the Development Project in the Draft EIR would be much the same for the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Odors

As discussed in Section IV.C (Air Quality) of the Draft EIR, objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Development Project described in the Draft EIR and the Revised Development Project do not include any of these land uses and does include residential and commercial land uses that are common to the Development Project area. No impacts related to odors would occur under Development Project described in the Draft EIR or the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Cultural Resources

As discussed in Section IV.D (Cultural Resources), none of the buildings on the Development Project site are considered significant historic resources under CEQA, and no impacts related to historic resources would occur under the Development Project as described in the Draft EIR or under the Revised Development Project.

Geology and Soils

As discussed in Section IV.E (Geology and Soils) of the Draft EIR, the Development Project site is subject to seismic ground shaking, could be subject to erosion, is within a potential dam inundation zone, and does contain expansive soils. The Draft EIR concluded that with implementation of Mitigation Measure E-1 (preparation and approval of a geotechnical report) and compliance with the City's building code, impacts related to geology and soils under the Development Project would be less than significant.

Regardless of what is developed at the Development Project site, the geologic and geotechnical conditions described for the Development Project site in the Draft EIR would still apply, and all development, including the Revised Development Project, would be subject to the City's requirement for preparation and approval of a geotechnical report (Mitigation Measure E-1) and compliance with the City's building code, which would ensure that no significant impacts related to geology and soil would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Greenhouse Gas Emissions

As discussed in Section IV.F (Greenhouse Gas Emissions) of the Draft EIR, the Development Project would generate a net increase of approximately 16,934.23 metric tons of CO2e emissions, an approximate 38.3 percent reduction in GHG emissions as result of the Development Project's mixed-use design, proximity to transit, transportation demand management program (TDM), and compliance with the required Los Angeles Green Building Code (refer to Table D). Additionally, consistency of the Development Project with the CAT Report and CARB Scoping Plan is included on Table IV.F-6 on page IV.F-18 and on Table IV.F-7 on page IV.F-21 (respectively), and consistency of the Development Project with the Los Angeles Green Building Code is included on page IV.F-21. As discussed, the Development Project would be consistency with the CAT Report, CARB Scoping Plan, and the Los Angeles Green Building Code.

As shown on Table D, the Revised Development Project would generate the less GHG emissions than the Development Project described in the Draft EIR. Because the Revised Development Project is only changing the amount of commercial land use square footage and the number of residential dwelling units and because the number of daily and peak-hour traffic trips would be reduced when compared to the Development Project described in the Draft EIR, the consistency discussions related to the CAT Report, CARB Scoping Plan, and the Los Angeles Green Building Code included in the Draft EIR apply equally to the Revised Development Project, and the Revised Development Project would be consistent with the CAT Report, CARB Scoping Plan, and the Los Angeles Green Building Code. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table D
Revised Development Project Operational Greenhouse Gas Emissions

Emissions Source	CO2e Emissions (Metric Tons per Year)	
	Proposed Development Project	**Revised Development Project**
Unmitigated		
Natural Gas Consumption	468.40	524.98
Hearth	392.71	465.70
Landscaping Equipment	13.70	16.25
Electricity Generation	4,058.69	3,280.48
Solid Waste Generation	667.68	477.04
Water Consumption	672.95	656.20
Motor Vehicles	26,966.11	18,710.11
Construction Amortized	168.56	176.52
Unmitigated Subtotal	***33,408.80***	*24,307.28*
Less Existing Project Site	***5,976.25***	*5,976.25*
Unmitigated Total Net Increase	***27,432.55***	***18,331.03***
Mitigated		
Natural Gas Consumption	412.92	461.77
Hearth	350.95	416.18
Landscaping Equipment	13.70	16.25
Electricity Generation	3,899.48	3,161.81
Solid Waste Generation	667.68	477.04
Water Consumption	578.37	564.27
Motor Vehicles	16,821.82	11,896.68
Construction Amortized	168.56	176.52
Mitigated Subtotal	***22,913.48***	*17,176.52*
Less Existing Project Site	***5,976.25***	*5,976.25*
Mitigated Total Net Increase	***16,937.23***	**11,200.27**
% Reduction Due to Mitigation	***38.3%***	*38.9%*

Source: Parker Environmental Consultants, January 2013. Calculation data and results provided in Attachment B.

Hazards and Hazardous Materials

As discussed in Section IV.G (Hazards and Hazardous Materials) of the Draft EIR, it is possible that underground storage tanks (USTs), polychlorinated biphenyls (PCBs), asbestos-containing materials (ACMs), lead-based paint (LBP), and possible soil contamination could exist at the Development Project site. With implementation of Mitigation Measures G-1 through G-7, impacts related to hazards and hazardous materials associated with the Development Project site were found to be less than significant.

Regardless of what is developed at the Development Project site, the hazards and hazardous materials conditions described for the Development Project site in the Draft EIR would still apply, and all development, including the Revised Development Project, would be subject to the requirements of Mitigation Measures G-1 through G-7, which would ensure that no significant impacts related to hazards and hazardous materials would occur. Therefore, the Revised Development Project would not result in

any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Hydrology and Water Quality

Surface Water Hydrology

As discussed in Section IV.H (Hydrology and Water Quality), in its existing condition, the Development Project site is almost entirely impervious, and during storm events, water sheetflows across the site and drains to the southeast of the Development Project site to the local City storm drain system. The Development Project would alter the on-site drainage patterns due to the development of the buildings, podiums, and open space areas that would modify the elevations of the Development Project site, thus altering the storm water runoff pattern. However, this alteration would not result in on-site erosion or siltation, because all runoff would be directed to areas of BMPs and/or other storm drain infrastructure. Additionally, the amount of runoff associated with post-Development-Project conditions would not exceed existing runoff rates and volumes, as required by the Bureau of Sanitation, and no additional storm drain capacity would be required to accommodate the Development Project. Impacts of the Development Project related to surface hydrology were found to be less than significant.

The overall footprint of the Revised Development Project would be the same as the Development Project described in the Draft EIR and would result in the same alteration of drainage patterns and the same volume and rate of runoff. Thus, the Revised Development Project would not generate runoff in excess of existing rates and volumes, and would not cause erosion or the need for additional storm drain capacity. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Tsunamis, Seiches, and Flooding

As discussed in Section IV.H (Hydrology and Water Quality) of the Draft EIR, according to the County of Los Angeles Flood and Inundation Hazards Map, the Development Project site lays within mapped inundation boundaries resulting from seiche or a breached upgradient reservoir. Further, the Development Project site is located within a "Potential Inundation Area." The Pacific Ocean is located approximately two miles to the west of the Development Project site. The Development Project would be subject to City requirements regarding development within a potential inundation area, including Flood Hazard Management Specific Plan, Ordinance No. 172081, and design and construction would be subject to City approval. The floor of any habitable space would need to be at least one foot above the base flood elevation. Thus, with compliance with City ordinance regarding inundation area construction and Proposed Project design approval, impacts related to inundation as a result of seiche or breached upgradient reservoir were found to be less than significant.

Regardless of what is developed at the Development Project site, the site would still have the potential to experience impacts from tsunamis and seiches, and all development, including the Revised Development Project, would be subject to the requirements of the City's ordinance regarding inundation area construction and Proposed Project design approval. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Groundwater

As discussed in Section IV.H (Hydrology and Water Quality) of the Draft EIR, the historic high groundwater level was at the Development Project site is approximately 40 feet bgs. However, groundwater levels fluctuate over time and across the site. The Development Project includes development of subterranean parking, and it is possible that groundwater could be encountered during excavation. As a result, a comprehensive geotechnical analysis of the on-site water level for the Development Project site shall be conducted and submitted to the City as part of the permitting process for the Development Project. The specific design recommendations presented in the comprehensive geotechnical report shall be incorporated into the design and construction of the Development Project to prevent any unforeseen impact change in conditions. As such, Mitigation Measure H-3 (preparation of and compliance with a geotechnical report) shall be implemented to reduce any unforeseen impact conditions. With implementation of Mitigation Measure H-3, impacts related to the loss of groundwater and alteration of groundwater flows were found to be less than significant.

The Revised Development Project also includes development of subterranean parking, and similar to the Development Project described in the Draft EIR, it is possible that groundwater could be encountered during excavation. The Development Project also would be required to comply with Mitigation Measure H-3, which would ensure that no significant impacts related to groundwater would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Water Quality

Construction

As discussed in Section IV.H (Hydrology and Water Quality) of the Draft EIR, three general sources of short-term construction-related storm water pollution associated with the Development Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment; and 3) the maintenance and operation of construction equipment. All construction activities associated with the Development Project shall be conducted in compliance with the State Water Resources Control Board's (SWRCB) General Construction Permit, including preparation and

implementation of a Storm Water Pollution Prevention Plan (SWPPP) (refer to Mitigation Measures H-4 through H-16) which would ensure that no significant construction-related water quality impacts would occur.

The Revised Development Project would involve the same types of construction activities as would occur under the Development Project described in the Draft EIR and would involve the sources of potential construction-related storm water pollution. All construction activities under the Revised Development Project also would be subject to the General Construction Permit requirements for water quality, including best management practices (BMPs) outlined in a SWPPP and implemented during construction that would ensure no significant construction-related water quality impacts would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Operation

As discussed in Section IV.H (Hydrology and Water Quality) of the Draft EIR, in order to prevent an increase in the rate of urban pollutant runoff, the Development Project would be designed to comply with: 1) Section 402(p) of the Federal Water Pollution Control Act, or Clean Water Act (CWA); 2) Order No. 01-182 of the Regional Water Quality Control Board (RWQCB) Los Angeles Region, which regulates the issuance of waste discharge requirements to Los Angeles County; 3) the County of Los Angeles Standard Urban Stormwater Mitigation Plan (SUSMP); and 4) the City of Los Angeles Bureau of Sanitation's Development Best Management Practices Handbook, Part B Planning Activities. Through implementation of various BMPs (such as treatment/filtration of storm water runoff before it enters the public storm drain system; oil and grease separators at storm drain inlets; implementation of good housekeeping practices) that are required as part of these existing regulations, operational water quality impacts of the Development Project were found to be less than significant.

The Revised Development Project would be required to comply with these same water quality regulations and would be required to implement the various BMPs outlined in the regulations to ensure that no significant water quality impacts would occur during the operation of the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Land Use and Planning

As discussed in Section IV.I (Land Use and Planning) of the Draft EIR, the Development Project would be substantially consistent with most of the applicable plans, policies, and regulations governing development of the Project site, including the Compass Growth Vision plan, the 2008 Regional Comprehensive Plan (RCP), the Air Quality Management Plan (AQMP), California Air Resources

Board's (CARB) Air Quality and Land Use Handbook, the Congestion Management Plan (CMP), the General Plan (including the Framework Element), most policies of the West Los Angeles Community Plan, the West Los Angeles Transportation Improvement Plan, the LAMC), and the Walkability Checklist. However, the Development Project would result in inconsistencies with certain objectives and policies of the General Plan and West Los Angeles Community Plan, related to retention of industrial land uses due to the requested General Plan Amendment to change the land use designation of the Development Project site from Light Industrial and Public Facilities to Community Commercial. The Development Project also would result in an inconsistency with CARBs policy related to siting residential land uses near significant sources of air pollution (e.g., the San Diego Freeway). For these reasons, impacts of the Development Project related to consistency with the General Plan, West Los Angeles Community Plan, and CARB's Air Quality and Land Use Handbook were found to be significant and unavoidable.[1]

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking, in proximity to the San Diego Freeway) identified for the Development Project in the Draft EIR and would require a General Plan Amendment to change the land use designation of the site from Light Industrial and Public Facilities to Community Commercial. Thus, similar to the Development Project described in the Draft EIR, the Revised Development Project would be substantially consistent with most of the applicable plans, policies, and regulations governing development of the Project site, including the Compass Growth Vision plan, the 2008 RCP, the AQMP, CARB Air Quality and Land Use Handbook, the CMP, the General Plan (including the Framework Element), most policies of the West Los Angeles Community Plan, the West Los Angeles Transportation Improvement Plan, the LAMC, and the Walkability Checklist. Additionally, the Revised Development Project also would result in inconsistencies with the same General Plan and West Los Angeles Community Plan policies and the same CARB policy as with the Development Project described in the Draft EIR, namely those policies related to retention of industrial land uses and siting residential land uses near significant sources of air pollution. Therefore, the Revised Development Project would not result in any new significant impacts and would

---

[1] *It should be noted, however, that the inconsistency of the Development Project and the Revised Development Project with those policies does not necessarily mean that the Project is inconsistent with the General Plan as a whole. State law does not impose a requirement that a proposed project comply with every policy in a land use plan, since such policies often try to accommodate a wide range of competing interests. Thus, to be "consistent" with a land use plan itself, a proposed project must only be "in harmony" with the applicable land use plan, and the Development Project and Revised Development Project meet that text under General Plan law. The inconsistency with policies related to the preservation of existing industrial land uses and siting of residential land uses near sources of air pollution may cause a land use impact that is significant within the meaning of CEQA, given the City's particular CEQA significance threshold for land use impacts for this Project.*

not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Mineral Resources

As discussed in Section IV.J (Mineral Resources) in the Draft EIR, the Development Project, the majority of the Development Project site is within an Oil Drilling District zone, constituting an area that contains known oil resources that are of unknown significance. The Development Project site does not contain any active or inactive mines, nor are there any permitted mining sites on the Development Project site. Furthermore, the Development Project site it located in a highly urbanized area of the City. The site is not delineated as a locally-important mineral resource recovery site on any city plans and is not classified as an MRZ-2 site. Despite the Development Project site's location in an Oil Drilling District zone, buildout of the Development Project would not result in the loss of availability or the extraction of the subsurface resources present in the Development Project vicinity and would not preclude the City and the State of California from future extractions of these resources should they become viable. Therefore, impacts related to mineral resources under the Development Project were found to be less than significant.

Because the Revised Development Project includes development of the same site as described for the Development Project in the Draft EIR and the same building footprint, the mineral resources conditions described for the Development Project in the Draft EIR (and above) also would apply to the Revised Development Project. Thus, the Revised Development Project would not result in the loss of availability or the extraction of the subsurface resources present in the Development Project vicinity and would not preclude the City and the State of California from future extractions of these resources should they become viable. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Noise

Construction Noise

As discussed in Section IV.K (Noise) of the Draft EIR, the closest related projects to the Development Project site are the proposed office development at 11110 West Pico Boulevard (Related Project No. 11) and the Expo II Project at the intersection of Sepulveda Boulevard and Exposition Boulevard (Related Project No. 33a). Although it cannot be determined at this time exactly when construction would occur for these two related projects, the potential exists such that the construction of these two identified related projects could occur at the same time as that of the Development Project. Due to the proximity of these two sites to the Development Project site (especially with the Expo II Project development located immediately adjacent of the Development Project buildings), it is anticipated that under the circumstances where construction at these sites were to occur concurrently, the culmination of the construction noise

levels from all three sites would result in a substantial increase in ambient noise levels at the nearby sensitive receptors in the general area. Therefore, even with implementation of the proposed mitigation measures, the cumulative noise impact that would occur, should construction of the nearby related projects occur at the same time as the Development Project, would be significant and unavoidable and the Development Project's contribution would be cumulatively considerable.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR and would have the same types of construction activities/schedule and associated noise levels as identified for the Development Project described in the Draft EIR. Thus, similar to the Development Project described in the Draft EIR, the Revised Development Project would have the potential to contribute to cumulative construction noise levels, and impacts would be significant and unavoidable. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Construction Vibration

As discussed in Section IV.K (Noise) of the Draft EIR, due to the proximity of the Department of Public Social Services (DPSS) building to the Development Project site, operation of heavy equipment (e.g., backhoes, dozers, graders, loaders, etc.) would cause a significant and unavoidable vibration impact at the DPSS building.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR and would have the same types of construction activities/schedule and associated noise levels as identified for the Development Project described in the Draft EIR. Thus, similar to the Development Project described in the Draft EIR, the Revised Development Project would cause a significant and unavoidable vibration impact at the DPSS building. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Operational Noise

Traffic Noise

As discussed in section IV.K (Noise) of the Draft EIR, traffic associated with the Development Project would not result in a noticeable change in noise levels (3.0 dB CNEL) along the study area roadways. Therefore, impacts related to traffic noise associated with the Development Project were found to be less than significant.

As discussed later in this section (refer to the subheading "Transportation/Traffic"), the Revised Development Project would generate fewer peak-hour and daily traffic trips. Thus, the traffic noise generated by the Revised Development Project would be less than that identified for the Development Project described in the Draft EIR, and less than significant. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Combined Transportation Noise

Interior Noise Levels

As discussed in Section IV.K (Noise) of the Draft EIR, typical building construction would provide approximately 20 dB of exterior-to-interior noise reduction at the residential units associated with the Development Project. Taking this noise reduction into account, the future interior noise level at many residential units would exceed 45 dB CNEL; this would be a potentially significant impact. However, Mitigation Measure K-5 is prescribed to ensure that once detailed architectural plans for the Proposed Development Project are available, an acoustical study shall be conducted to verify that the interior noise level at all residential units on the Development Project site shall not exceed the City's standard of 45 dB CNEL. The design features considered to address interior noise may include one or more of the following elements: sound-rated windows and doors, size and orientation of windows relative to the noise sources (streets, freeway, and light rail line), upgraded exterior wall construction, insulation batts, and forced air ventilation/air conditioning. With implementation of Mitigation Measure K-5 and the design features that are determined as a result of the acoustical study, interior noise impacts of the Development Project were found to be less than significant.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the overall building construction (building materials, design, architecture, and massing) of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Thus, the Revised Development Project would be required to implement Mitigation Measure K-5 to ensure that interior noise levels would not exceed the City's standard of 45 dB CNEL. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Exterior Noise Levels

As discussed in Section IV.K (Noise) of the Draft EIR, the highest "Normally Acceptable" exterior noise level for residential land uses is 65 dB CNEL, while the highest "Conditionally Acceptable" exterior noise level for residential land uses is 75 dB CNEL. The Development Project includes a courtyard area

in the center of the Development Project site, and the proposed residential structures include outdoor balconies, some of which would face out from the site. Exterior noise levels at the residential facades facing out from the Development Project site would range from 58 dB CNEL to 76 dB CNEL. Outdoor areas within the center of the site would not experience exterior noise levels in excess of what is considered "Normally Acceptable" for residential land uses, considering the attenuation effect of the proposed structures. However, some of the outdoor balcony areas facing out from the Project could experience noise levels in excess of what is considered "Normally Acceptable" or "Conditionally Acceptable" for residential land uses due to the proximity of the Development Project site to the San Diego Freeway. Therefore, impacts of the Development Project related to exterior noise levels at the Development Project site were found to be significant and unavoidable.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the overall building construction (building siting, design, architecture, and massing) of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Thus, similar to the Development Project described in the Draft EIR, some of the outdoor balcony areas facing out from the Revised Development Project could experience noise levels in excess of what is considered "Normally Acceptable" or "Conditionally Acceptable" for residential land uses due to the proximity of the Project site to the San Diego Freeway. For these same reasons, the significant exterior noise impacts identified for the Development Project described in the Draft EIR also would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Mechanical Equipment

As discussed in Section IV.K (Noise) of the Draft EIR, mechanical equipment at the Development Project site would include heating, ventilation, and air conditioning (HVAC) units for the residential and commercial uses, elevator equipment, refrigeration units for the commercial uses, trash compacting equipment, and the air supply and exhaust systems for the subterranean parking levels. Most of this type of mechanical equipment would be placed within the building structures, and building walls would attenuate noise generated by this equipment. HVAC units could be placed on rooftops and would be shielded in accordance with the LAMC. Mitigation Measure K-6 is prescribed to ensure once detailed mechanical plans for the Proposed Development Project are available, an acoustical study shall be conducted to verify that the noise level generated by mechanical equipment at the Project site comply with the City's noise ordinance standards. With implementation of Mitigation Measure K-6 and the design features that are determined as a result of the acoustical study, impacts related to mechanical equipment noise associated with the Development Project were found to be less than significant.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the overall building construction (building siting, design, architecture, and massing) of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Thus, the Revised Development Project would be required to implement Mitigation Measure K-6 to ensure noise levels generated by mechanical equipment at the Project site comply with the City's noise ordinance standards. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Loading Dock

As discussed in Section IV.K (Noise) of the Draft EIR, the loading area for the proposed market and major retail store is to be located at the southwest corner of the Development Project's building, adjacent to the existing Public Storage facility. The primary sources of noise associated with the loading docks are delivery truck engines, refrigeration units on refrigerated delivery trucks, backup alarms, air brakes, and noise generated during the unloading of delivery trucks. The analysis of noise impacts associated with the loading dock activities on off-site receptors showed that with implementation of Mitigation Measure K-2 (compliance with LAMC requirements for loading hours), no significant noise impacts associated with the loading dock activities would occur to off-site receptors.[2]

However, the Development Project includes residential units with exterior balconies located above the loading area. The loading dock doors would be located below an overhang such that they are shielded from view of the residential units. Nevertheless, the units would be exposed to noise from truck engines, refrigeration units, backup beepers, and air brakes, as these would not be shielded from view and could experience noise levels in excess of the City's threshold of 5 dB(A). Implementation of Mitigation Measure K-3 (minimizing truck operation in the loading dock area) would minimize the noise levels, but exterior noise impacts associated with loading dock activities to on-site receptors were found to be significant and unavoidable.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the overall building construction (location of loading dock in relation to off- and on-site receptors, design, and architecture) of the Revised

---

[2] *It should be noted that CEQA typically does not require an analysis of the environment's effect on a project, but only the impacts of a project on the environment. (Ballona Wetlands Trust v. City of Los Angeles [2011] 201 Cal. App. 4th 455.)*

Development Project would be substantially the same as the Development Project described in the Draft EIR. Thus, noise levels associated with loading dock activities under the Revised Development Project would be substantially the same as identified for the Development Project. The Revised Development Project also would be required to implement Mitigation Measure K-3 to minimize loading dock noise levels. For these reasons, the less than significant impacts to off-site receptors and significant and unavoidable impacts to on-site receptors identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Vibration

As discussed in Section IV.K (Noise) of the Draft EIR, vibration level estimates for the Expo II Line showed that the estimated vibration velocity of the light-rail train would not cause vibration impacts at the Development Project site. The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. Additionally, the overall building construction (building siting, design, and architecture) of the Revised Development Project would be substantially the same as the Development Project described in the Draft EIR. Thus, the Revised Development Project would be exposed to the same less than significant noise levels from the Expo II Line. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Population, Housing, and Employment

As discussed in Section IV.L (Population, Housing, and Employment) of the Draft EIR, the Development Project would generate approximately 1,566 new residents, 515 net new jobs, and 538 residential dwelling units. The Draft EIR concluded that although the Development Project would exceed population, housing, and employment projections within Census Tract 2678, the Development Project would be consistent with population and housing projections for the Los Angeles subregion and West Los Angeles Community Plan area and the employment projections for the Los Angeles subregion. The surrounding area is already built out, and Development Project would not induce substantial growth in an undeveloped area. Therefore, impacts related to population, housing, and employment associated with the Development Project were found to be less than significant.

The Revised Development Project would generate approximately 1,857 new residents, 276 net new jobs, and 638 residential dwelling units.[3] As shown on Tables E, F, and G the population, housing, and employment associated with the Revised Development Project would be comparable to the population, housing, and employment associated with the Development Project described in the Draft EIR. For these reasons, the less than significant population, housing, and employment impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table E
Population Generation Comparison

Time Period	Population Increase (persons)	Proposed Development Project %	Revised Development Project %
City/Subregion			
2000 – 2015	433,383	0.38	0.43
2015 – 2030	220,156	0.70	0.84
West Los Angeles Community Plan			
2005 – 2030	7,780	20	24
Census Tract			
2010 – 2015	49	+100	+100
2015 – 2030	154	+100	+100

Table F
Housing Generation Comparison

Time Period	Housing Increase (dwelling units)	Proposed Development Project %	Revised Development Project %
City/Subregion			
2000 – 2015	153,665	0.35	0.41
2015 – 2030	160,341	0.33	0.39
West Los Angeles Community Plan			
2005 – 2030	8,193	6.6	7.7
Census Tract			
2010 – 2015	47	+100	+100
2015 – 2030	127	+100	+100

[3] *Residents: 2.91 x 638 = 1,857 (residential rate source: SCAG); Jobs: (2.2371/1,000 sf x 160,000 sf) – 82 existing jobs = 276 jobs (employment rate source: LAUSD)*

Table G
Employment Generation Comparison

Time Period	Employment Increase (jobs)	Proposed Development Project %	Revised Development Project %
City/Subregion			
2000 – 2015	82,198	0.62	0.33
2015 – 2030	96,332	0.53	0.28

Public Services

Fire

As discussed in Section IV.M (Public Services – Fire Protection), the Development Project would introduce approximately 1,566 permanent residents and approximately 515 net new employees that would generate a potential increase in the demand for fire protection services. The Development Project would be located approximately 0.7 mile from LAFD Fire Station 59 and would comply with the response distances required by LAMC Section 57.09.06 for all uses. Vehicular driveways and a centrally located designated fire lane would provide adequate emergency access to the Development Project site. Additionally, the Development Project would be required to provide adequate fire flow and an on-site automatic sprinkler system. Considering the distance from the closest LAFD facilities, the Development Project's emergency access, fire flow, and fire suppression system, impacts related to fire protection associated with the Development Project were found to be less than significant.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. The Revised Development Project would generate approximately 1,857 new residents and 276 net new employees that would generate a potential increase in the demand for fire protection services similar to that under the Development Project described in the Draft EIR. The Revised Development Project also would include vehicular driveways in generally the same location as the location of the driveways for the Development Project described in the Draft EIR and would include a centrally located designated fire lane to provide adequate emergency access to the site. Additionally, the Revised Development Project also would be required to provide adequate fire flow and an on-site automatic sprinkler system. For these reasons, the less than significant impacts to fire protection services identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Police

As discussed in Section IV.M (Public Services – Police Protection) of the Draft EIR, the Development Project would introduce approximately 1,566 permanent residents and approximately 515 net new employees that would generate a potential increase in the demand for police protection services. The environmental impacts of the Development Project with respect to police protection were determined based on need for a new or physically altered police station. Although current response times, crime statistics, and the LOS at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection was evaluated using the existing number of police officers in the Development Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Development Project would introduce to the area. LAPD indicated that the Development Project would impact police services in the West Los Angeles Area. The Development Project would potentially decrease the officer-to-population ratio in the area and would require up to an additional two police officers to maintain the current officer-to-population ratios (1 officer/970 people).[4] However, the Development Project would directly and indirectly generate recurring revenue for the City, including sales and property tax that could be used to meet increased demands for additional staffing, equipment, and facilities. Implementation of the City's Standard Mitigation Measures (refer to Mitigation Measures M-4 through M-6) is required. Impacts related to police protection services associated with the Development Project were found to be less than significant.

The Revised Development Project includes development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. The Revised Development Project would generate approximately 1,857 new residents and 276 net new employees that would generate a potential increase in the demand for police protection services similar to that under the Development Project described in the Draft EIR. Similar to the Development Project described in the Draft EIR, the Revised Development Project would require up to an additional two police officers to maintain the current officer-to-population ratios. Additionally, the Revised Development Project also would directly and indirectly generate recurring revenue for the City, including sales and property tax that could be used to meet increased demands for additional staffing, equipment, and facilities. Implementation of the City's Standard Mitigation Measures (refer to Mitigation Measures M-4 through M-6) is required. For these reasons, the less than significant impacts to police protection services identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

---

[4] *227,950 residents in the service area/225 officers = 1 officer/970 residents*

Schools

As discussed in Section IV.M (Public Services – School Services) of the Draft EIR, the Development Project's residential population would include school-aged children and would create a need for school services. In accordance with the California Government Code, the Applicant of the Development Project would be required to pay of school facilities fees, payment of which, by law, would mitigate any impacts the Development Project could have on school services. With implementation of the City's Standard Mitigation (refer to Mitigation Measure M-13 [payment of required school facilities fees based on unit count and commercial/parking square footage]), impacts on school services as a result of the Development Project were found to be less than significant.

The Revised Development Project includes 100 more residential dwelling units than the Development Project described in the Draft EIR and would have a higher residential population, including more school-aged children, which would create a demand for school services. However, similar to the Development Project described in the Draft EIR, the Applicant under the Revised Development Project would be required to pay school facilities fees based on the unit count and commercial/parking square footage associated with the Revised Development Project that would mitigate any impacts the Revised Development Project could have on school services. For these reasons, the less than significant impacts to school services identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Parks and Recreation

As discussed in Section IV.M (Public Services – Parks and Recreation) of the Draft EIR, the Development Project would be required to provide 59,125 square feet of open space per the LAMC. However, the Development Project would provide 87,490 square feet of common open space and recreational amenities at the Development Project site, in excess of the LAMC requirements. Nonetheless, the residential population associated with the Development Project would contribute to the parkland-to-population deficit in the West Los Angeles Community Plan are, creating a demand for 3.1 acres of parkland. (The preferred parkland-to-population ratio is 2 acre per 1,000 residents.) The Development Project Applicant would be required to implement Mitigation Measures M-9 and M-10 (required dedication of parkland and/or payment of in-lieu fees in accordance with existing City regulations) to ensure that no significant impacts related to parks and recreational services would occur.

The Revised Development Project would be required to provide 72,800 square feet of open space per the LAMC. However, the Revised Development Project would provide 91,500 square feet of common open

space and recreational amenities, in excess of the LAMC requirements.[5] Similar to the Development Project described in the Draft EIR, the Revised Development Project would contribute to the parkland-to-population deficit in the West Los Angeles Community Plan are, creating a demand for 3.7 acres of parkland.[6] Further, similar to the Development Project described in the Draft EIR, the Applicant under the Revised Development Project would be required to implement Mitigation Measures M-9 and M-10 (dedicating parkland and/or paying in-lieu fees) to ensure that no significant impacts related to parks and recreational services would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Libraries

As discussed in Section IV.M (Public Services – Libraries) of the Draft EIR, the City of Los Angeles Public Library (LAPL) recommends a mitigation fee of $200 per capita, based on the projected population of the Development Project, to alleviate any increased library demands as a result of buildout of the Development Project. Through payment of this fee (refer to Mitigation Measure M-11), impacts related to library services associated with the Development Project were found to be less than significant.

The Applicant under the Revised Development Project would be required to pay the LAPL a mitigation fee of $200 per capita based on the projected population of the Revised Development Project. Thus, no significant impacts related to library services would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Traffic/Transportation

As discussed in Section IV.N (Traffic/Transportation) of the Draft EIR, the Development Project would generate approximately 13,713 daily trips, 449 AM peak-hour trips, and 1,232 PM peak-hour trips. As shown on Table H, the Revised Development Project would generate approximately 9,953 daily trips (3,760 fewer trips), 394 AM peak-hour trips (55 fewer trips), and 992 PM peak-hour trips (240 fewer trips).

---

[5] *[(342 studio/1br du) x (100 sf/du) = 34,200 sf] + [(275 2br du) x (125 sf/du) = 34,375 sf] + [(21 3br du) x (175 sf/du) = 3,675] = 72,250 sf*

[6] *[(1,857 residents) ÷ (1,000)] = 1.857 thousand residents. [(2 acres of parkland) x (1.857 thousand residents)] = 3.7 required acres*

Table H
Revised Development Project Trip Generation

Size/Use	Daily Trips	AM Peak-Hour Trips			PM Peak-Hour Trips		
		In	Out	Total	In	Out	Total
Development Project							
566 units - Apartments	3,764	57	231	289	180	97	277
(less 10% Transit Utilization)	(376)	(6)	(23)	(29)	(18)	(10)	(28)
Subtotal Apartment Trips	*3,388*	*52*	*208*	*260*	*162*	*87*	*249*
72 units – Senior Housing	251	3	6	9	4	2	6
(Less 10% Transit Utilization)	(25)	0	(1)	(1)	(1)	0	(1)
Subtotal Senior Housing Trips	*226*	*3*	*5*	*8*	*3*	*2*	*5*
100,000 sf – Major Retail	5,724	72	34	106	328	328	656
(Less 5% Internal Project Capture)	(286)	(3)	(2)	(5)	(16)	(17)	(33)
(Less 30% Pass-By Trips)	(1,631)	(20)	(10)	(30)	(93)	(94)	(187)
Subtotal Major Retail Trips	*3,807*	*49*	*22*	*71*	*219*	*217*	*436*
10,000 sf – Local-Serving Retail	443	8	5	13	22	28	50
(less 5% Internal Project Capture)	(22)	(1)	0	(1)	(1)	(2)	(3)
(less 10% Pass-By Trips)	(42)	(1)	0	(1)	(2)	(3)	(5)
Subtotal Local-Serving Retail Trips	*379*	*6*	*5*	*11*	*19*	*23*	*42*
50,000 sf – Supermarket	5,112	110	70	180	264	253	517
(less 5% Internal Project Capture)	(256)	(5)	(4)	(9)	(13)	(13)	(26)
(less 40% Pass-By Trips)	(1,942)	(41)	(27)	(68)	(100)	(96)	(196)
Subtotal Supermarket Trips	*2,914*	*64*	*39*	*103*	*151*	*144*	*295*
Subtotal Revised Development Project Trips	***10,714***	***174***	***279***	***453***	***554***	***473***	***1,027***
Less Existing Site Uses							
6,500 sf – Building Materials Store	294	11	6	17	10	11	21
(less 20% Pass-By Trips)	(59)	(2)	(1)	(3)	(2)	(2)	(4)
Subtotal Building Materials Store Trips	*235*	*9*	*5*	*14*	*8*	*9*	*17*
Catalina Pacific Cement Batch Plant*							
With PCE Adjustment (1.50)	526	18	27	45	9	9	18
Subtotal Existing Site Uses (in PCE)	*761*	*27*	*32*	*59*	*17*	*18*	*35*
Total Net New Site Trips (Revised Development Project)	***9,953***	***147***	***247***	***394***	***537***	***455***	***992***
Total Net New Site Trips (Proposed Development Project)	***13,713***	***193***	***256***	***449***	***649***	***583***	***1,232***

* *Existing site trips based on empirical counts.*
Source: Hirsch/Green Transportation Consulting, Inc., 2012. A detailed Traffic Study for the Revised Development Project, including a detailed description of the traffic generation rates used to calculate traffic generation, is included as Attachment C to this document.

Los Angeles County Congestion Management Plan (CMP)

As discussed in Section IV.N (Transportation/Traffic) of the Draft EIR, the CMP calls for preparation of a traffic impact analysis (TIA) for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and for all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. The traffic generation associated with the Development Project described in the Draft EIR would not trigger the requirements for preparation of a TIA. Therefore, impacts related to CMP facilities were found to be less than significant for the Development Project.

As shown on Table H, the Revised Development Project would generate fewer peak-hour traffic trips than would the Development Project described in the Draft EIR. Thus, traffic generation associated with the Revised Development Project also would not trigger the requirements for preparation of a TIA, and no impacts related to CMP facilities would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Intersection Operations

Existing-With-Project

As discussed in Section IV.N (Transportation/Traffic) of the Draft EIR, under the Existing-With-Project traffic condition, the Development Project would result in significant impacts at 27 of the study intersections. With implementation of Mitigation Measures N-1 through N-8 identified in the Draft EIR, under the Existing-Plus-Project traffic condition, the Development Project would result in significant and unavoidable impacts at 24 of the study intersections.

As shown on Table I, the Revised Development Project would result in significant impacts at 24 of the study intersections. With implementation of Mitigation Measures N-1 through N-8, under the Existing-With-Project traffic condition, the Revised Development Project would result in significant and unavoidable impacts at 19 of the study intersections (refer to Table J). Overall, the Revised Development Project would result in fewer intersection impacts under the Existing-With-Project traffic condition. Additionally, the Revised Development Project would not increase the severity of the significant impacts identified for the Development Project described in the Draft EIR (refer to Table I). Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table I
Intersection LOS Significant Impact Comparison
Existing-With-Project Traffic Condition

Int. #	Intersection	Peak Hour	Existing		Proposed Development Project			Revised Development Project		
			V/C or Delay	LOS	V/C or Delay	LOS	Change	V/C or Delay	LOS	Change
1	Wilshire Boulevard and Sepulveda Boulevard	AM	1.019	F	1.021	F	0.002	1.021	F	0.002
		PM	0.915	E	0.926	E	**0.011**	0.923	E	0.008
4	Ohio Avenue and Sepulveda Boulevard	AM	0.879	D	0.883	D	0.004	0.882	D	0.003
		PM	1.002	F	1.014	F	**0.012**	1.011	F	0.009
6	Santa Monica Boulevard and Sepulveda Boulevard	AM	0.820	D	0.828	D	0.008	0.827	D	0.007
		PM	0.868	D	0.906	E	**0.038**	0.896	D	**0.028**
7	Santa Monica Boulevard and Westwood Boulevard	AM	1.034	F	1.040	F	0.006	1.041	F	0.007
		PM	0.919	E	0.931	E	**0.012**	0.930	E	**0.011**
14	Olympic Boulevard and Bundy Drive	AM	0.975	E	0.981	E	0.006	0.979	E	0.004
		PM	0.899	D	0.916	E	**0.017**	0.913	E	**0.014**
15	Olympic Boulevard and Barrington Avenue	AM	0.866	D	0.871	D	0.005	0.870	D	0.004
		PM	0.955	E	0.968	E	**0.013**	0.964	E	0.009
16	Olympic Boulevard and Sawtelle Boulevard	AM	0.837	D	0.843	D	0.006	0.843	D	0.006
		PM	1.063	F	1.079	F	**0.016**	1.077	F	**0.014**
17	Olympic Boulevard and Sepulveda Boulevard	AM	0.878	D	0.899	D	**0.021**	0.894	D	0.016
		PM	0.925	E	1.012	F	**0.087**	0.991	E	**0.066**
18	Olympic Boulevard and Westwood Boulevard	AM	1.003	F	1.010	F	0.007	1.010	F	0.007
		PM	0.907	E	0.924	E	**0.017**	0.920	E	**0.013**
21	Tennessee Avenue/San Diego Freeway SB Off-Ramp and Sawtelle Boulevard	AM	0.442	A	0.457	A	0.015	0.454	A	0.012
		PM	0.807	D	0.845	D	**0.047**	0.846	D	**0.039**
25	Pico Boulevard and Centinela Avenue	AM	0.829	D	0.839	D	0.010	0.835	D	0.006
		PM	0.971	E	1.000	E	**0.029**	0.993	E	**0.022**
26	Pico Boulevard and Bundy Drive	AM	1.116	F	1.126	F	**0.010**	1.122	F	0.006
		PM	1.071	F	1.105	F	**0.034**	1.096	F	**0.025**
27	Pico Boulevard and Barrington Avenue	AM	0.915	E	0.927	E	**0.012**	0.923	E	0.008
		PM	0.972	E	1.002	F	**0.030**	0.995	E	**0.023**
28	Pico Boulevard and Gateway Boulevard	AM	0.908	E	0.924	E	**0.016**	0.919	E	**0.011**
		PM	0.964	E	1.011	F	**0.047**	0.999	E	**0.035**

Table I
Intersection LOS Significant Impact Comparison
Existing-With-Project Traffic Condition

Int. #	Intersection	Peak Hour	Existing		Proposed Development Project			Revised Development Project		
			V/C or Delay	LOS	V/C or Delay	LOS	Change	V/C or Delay	LOS	Change
29	Pico Boulevard and Sawtell Boulevard	AM	1.013	F	1.061	F	0.048	1.050	F	**0.037**
		PM	0.992	E	1.152	F	0.160	1.112	F	**0.120**
30	Pico Boulevard and Cotner Avenue	AM	0.649	B	0.664	B	0.015	0.663	B	0.014
		PM	0.728	C	0.776	C	**0.048**	0.755	C	0.027
31	Pico Boulevard and Sepulveda Boulevard	AM	0.992	E	1.040	F	**0.048**	1.037	F	**0.045**
		PM	1.096	F	1.326	F	**0.230**	1.271	F	**0.175**
33	Pico Boulevard and Westwood Boulevard	AM	0.722	C	0.735	C	0.013	0.736	C	0.014
		PM	0.816	D	0.854	D	**0.038**	0.847	D	**0.031**
34	Pico Boulevard and Overland Avenue	AM	0.851	D	0.858	D	0.007	0.857	D	0.006
		PM	0.901	E	0.915	E	**0.014**	0.912	E	**0.011**
38	Pico Boulevard and Motor Avenue/Fox Studios Driveway	AM	0.764	C	0.767	C	0.003	0.767	C	0.003
		PM	0.936	E	0.951	E	**0.015**	0.948	E	**0.012**
39	Pico Boulevard and Avenue of the Stars	AM	0.594	A	0.600	A	0.006	0.598	A	0.004
		PM	0.558	A	0.574	A	0.016	0.571	A	**0.013**
40	Exposition Boulevard and Sepulveda Boulevard	AM	0.707	C	0.772	C	**0.065**	0.769	C	**0.062**
		PM	0.811	D	0.990	E	**0.179**	0.961	E	**0.150**
44	National Boulevard and Sawtelle Boulevard	AM	1.193	F	1.205	F	**0.012**	1.202	F	0.009
		PM	1.165	F	1.178	F	**0.013**	1.174	F	0.009
46	National Boulevard and San Diego Freeway NB On-Ramp	AM	0.819	F[3]	0.836	F[3]	0.017	0.836	F	**0.017**
		PM	0.789	E[3]	0.829	E[3]	**0.040**	0.827	E	**0.038**
47	National Boulevard and Sepulveda Boulevard	AM	1.076	F	1.140	F	**0.064**	1.133	F	**0.057**
		PM	1.131	F	1.247	F	**0.116**	1.227	F	**0.096**
48	National Boulevard and Westwood Boulevard	AM	0.584	A	0.597	A	0.013	0.593	A	0.009
		PM	0.830	D	0.880	D	**0.050**	0.867	D	**0.037**
49	Santa Monica Freeway WB On-/Off-Ramps/ National Boulevard and Overland Avenue	AM	0.982	E	1.009	F	**0.027**	1.008	F	**0.026**
		PM	1.080	F	1.146	F	**0.066**	1.127	F	**0.047**
53	Palms Boulevard and Sepulveda Boulevard	AM	1.045	F	1.049	F	0.004	1.048	F	0.003
		PM	1.079	F	1.091	F	**0.012**	1.091	F	**0.011**

Table I
Intersection LOS Significant Impact Comparison
Existing-With-Project Traffic Condition

Int. #	Intersection	Peak Hour	Existing		Proposed Development Project			Revised Development Project		
			V/C or Delay	LOS	V/C or Delay	LOS	Change	V/C or Delay	LOS	Change
54	Venice Boulevard and Sepulveda Boulevard	AM	0.919	E	0.929	E	**0.010**	0.927	E	0.008
		PM	0.954	E	0.967	E	**0.019**	0.965	E	**0.011**

Bold *text indicates a significant impact.*

Source: Hirsch/Green Transportation Consulting, Inc. 2009 and 2012.

Table J
Revised Development Project
Existing-With-Project – Impacted Intersections (w/Mitigation)

Int. #	Intersection	Peak Hour	Significant Impact	
			Proposed Development Project	Revised Development Project
1	Wilshire Boulevard and Sepulveda Boulevard	AM		
		PM	X	
4	Ohio Avenue and Sepulveda Boulevard	AM		
		PM	LTS w/M	
6	Santa Monica Boulevard and Sepulveda Boulevard	AM		
		PM	X	X
7	Santa Monica Boulevard and Westwood Boulevard	AM		
		PM	X	X
14	Olympic Boulevard and Bundy Drive	AM		
		PM	X	X
15	Olympic Boulevard and Barrington Avenue	AM		
		PM	X	
16	Olympic Boulevard and Sawtelle Boulevard	AM		
		PM	X	X
17	Olympic Boulevard and Sepulveda Boulevard	AM	X	
		PM	X	X
18	Olympic Boulevard and Westwood Boulevard	AM		
		PM	LTS w/M	LTS w/M
21	Tennessee Avenue/San Diego Freeway SB Off-Ramp and Sawtelle Boulevard	AM		
		PM	LTS w/M	LTS w/M
25	Pico Boulevard and Centinela Avenue	AM		
		PM	X	X
26	Pico Boulevard and Bundy Drive	AM	X	
		PM	X	X
27	Pico Boulevard and Barrington Avenue	AM	LTS w/M	
		PM	LTS w/M	LTS w/M
28	Pico Boulevard and Gateway Boulevard	AM	X	X
		PM	X	X
29	Pico Boulevard and Sawtelle Boulevard	AM	X	X
		PM	X	X
30	Pico Boulevard and Cotner Avenue	AM		
		PM	X	
31	Pico Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
33	Pico Boulevard and Westwood Boulevard	AM		
		PM	X	X
34	Pico Boulevard and Overland Avenue	AM		
		PM	X	X
38	Pico Boulevard and Motor Avenue/Fox Studios Driveway	AM		
		PM	X	X
40	Exposition Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X

Table J
Revised Development Project
Existing-With-Project – Impacted Intersections (w/Mitigation)

Int. #	Intersection	Peak Hour	Significant Impact	
			Proposed Development Project	Revised Development Project
44	National Boulevard and Sawtelle Boulevard	AM	X	
		PM	X	
46	National Boulevard and San Diego Freeway NB On-Ramp	AM		X
		PM	X	X
47	National Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
48	National Boulevard and Westwood Boulevard	AM		
		PM	X	X
49	Santa Monica Freeway WB On-/Off-Ramps/National Boulevard and Overland Avenue	AM	X	X
		PM	X	X
53	Palms Boulevard and Sepulveda Boulevard	AM		
		PM	X	X
54	Venice Boulevard and Sepulveda Boulevard	AM	LTS w/M	
		PM	LTS w/M	LTS w/M

LTS w/M = Less than significant impact with mitigation.
Source: Hirsch/Green Transportation Consulting, Inc., February 2010 and December 2012.

Cumulative-With Project

As discussed in Section IV.N (Transportation/Traffic) of the Draft EIR, under the Cumulative-With-Project traffic condition, the Development Project would result in significant impacts at 27 of the study intersections. Although implementation of Mitigation Measures N-1 through N-8 would reduce the significant impacts under the Development Project, the impacts at the 27 study intersections would be significant and unavoidable.

As shown on Table K, the Revised Development Project would result in significant impacts at 25 of the study intersections. With implementation of Mitigation Measures N-1 through N-8, under the Cumulative-With-Project traffic condition, the Revised Development Project would result in significant and unavoidable impacts at 18 of the study intersections (refer to Table L). Overall, the Revised Development Project would result in fewer intersection impacts under the Cumulative-With-Project traffic condition. Additionally, the Revised Development Project would not increase the severity of the significant impacts identified for the Development Project described in the Draft EIR (refer to Table K). Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table K
Intersection LOS Significant Impact Comparison
Cumulative-With-Project Traffic Condition

Int. #	Intersection	Peak Hour	Future Without Project		Proposed Development Project			Revised Development Project		
			V/C or Delay	LOS	V/C or Delay	LOS	Change	V/C or Delay	LOS	Change
3	Wilshire Boulevard and Westwood Boulevard	AM	0.695	B	0.699	B	0.004	0.700	B	0.005
		PM	0.899	D	0.912	E	**0.013**	0.910	E	**0.011**
4	Ohio Avenue and Sepulveda Boulevard	AM	0.931	E	0.935	E	0.004	0.934	E	0.003
		PM	1.063	F	1.075	F	**0.012**	1.073	F	**0.010**
6	Santa Monica Boulevard and Sepulveda Boulevard	AM	0.910	E	0.919	E	0.009	0.917	E	0.007
		PM	1.001	F	1.039	F	**0.038**	1.030	F	**0.029**
7	Santa Monica Boulevard and Westwood Boulevard	AM	1.115	F	1.122	F	0.007	1.121	F	0.006
		PM	1.021	F	1.032	F	**0.011**	1.030	F	0.009
14	Olympic Boulevard and Bundy Drive	AM	1.198	F	1.204	F	0.006	1.203	F	0.005
		PM	1.140	F	1.427	F	**0.017**	1.423	F	**0.013**
15	Olympic Boulevard and Barrington Avenue	AM	0.990	E	0.995	E	0.005	0.994	E	0.004
		PM	1.129	F	1.142	F	**0.013**	1.138	F	0.009
16	Olympic Boulevard and Sawtelle Boulevard	AM	0.942	E	0.948	E	0.006	0.947	E	0.005
		PM	1.245	F	1.261	F	**0.016**	1.260	F	**0.015**
17	Olympic Boulevard and Sepulveda Boulevard	AM	1.038	F	1.058	F	**0.020**	1.053	F	**0.015**
		PM	1.131	F	1.217	F	**0.086**	1.196	F	**0.065**
18	Olympic Boulevard and Westwood Boulevard	AM	1.088	F	1.096	F	0.008	1.096	F	0.008
		PM	0.996	E	1.013	F	**0.017**	1.010	F	**0.014**
21	Tennessee Avenue/San Diego Freeway SB Off-Ramp and Sawtelle Boulevard	AM	0.504	A	0.518	A	0.014	0.515	A	0.011
		PM	0.880	D	0.927	E	**0.047**	0.920	E	**0.040**
24	Pico Boulevard and Santa Monica Freeway EB Off-Ramp/34th Street	AM	0.829	D	0.839	D	0.010	0.835	D	0.006
		PM	0.837	D	0.869	D	**0.032**	0.861	D	**0.024**
25	Pico Boulevard and Centinela Avenue	AM	0.919	E	0.929	E	**0.010**	0.925	E	0.006
		PM	1.130	F	1.161	F	**0.031**	1.153	F	**0.023**
26	Pico Boulevard and Bundy Drive	AM	1.238	F	1.247	F	0.009	1.246	F	0.008
		PM	1.158	F	1.178	F	**0.020**	1.173	F	**0.015**
27	Pico Boulevard and Barrington Avenue	AM	0.939	E	0.952	E	**0.013**	0.950	E	**0.011**
		PM	0.741	C	0.761	C	0.020	0.755	C	0.014

Table K
Intersection LOS Significant Impact Comparison
Cumulative-With-Project Traffic Condition

Int. #	Intersection	Peak Hour	Future Without Project		Proposed Development Project			Revised Development Project		
			V/C or Delay	LOS	V/C or Delay	LOS	Change	V/C or Delay	LOS	Change
28	Pico Boulevard and	AM	0.818	D	0.828	D	0.010	0.825	D	0.007
	Gateway Boulevard	PM	0.883	D	0.917	E	**0.034**	0.909	E	**0.026**
29	Pico Boulevard and	AM	1.105	F	1.154	F	**0.049**	1.143	F	**0.038**
	Sawtelle Boulevard	PM	1.077	F	1.237	F	**0.160**	1.197	F	**0.120**
30	Pico Boulevard and	AM	0.706	C	0.720	C	0.014	0.719	C	0.013
	Cotner Avenue	PM	0.791	C	0.839	D	**0.048**	0.819	D	**0.028**
31	Pico Boulevard and	AM	1.394	F	1.454	F	**0.060**	1.449	F	**0.055**
	Sepulveda Boulevard	PM	1.608	F	1.895	F	**0.287**	1.825	F	**0.217**
33	Pico Boulevard and	AM	0.783	C	0.795	C	0.012	0.796	C	0.013
	Westwood Boulevard	PM	0.891	D	0.929	E	**0.038**	0.921	E	**0.030**
34	Pico Boulevard and	AM	0.914	E	0.920	E	0.006	0.920	E	0.006
	Overland Avenue	PM	0.983	E	0.997	E	**0.014**	0.994	E	**0.011**
38	Pico Boulevard and	AM	0.798	C	0.803	D	0.005	0.803	D	0.005
	Motor Avenue/Fox Studios Driveway	PM	0.984	E	1.000	E	**0.016**	0.998	E	**0.014**
40	Exposition Boulevard and	AM	1.164	F	1.257	F	**0.093**	1.253	F	**0.089**
	Sepulveda Boulevard	PM	1.297	F	1.396	F	**0.099**	1.373	F	**0.076**
44	National Boulevard and	AM	1.014	F	1.021	F	0.007	1.019	F	0.005
	Sawtelle Boulevard	PM	1.108	F	1.127	F	**0.019**	1.124	F	**0.016**
47	National Boulevard and	AM	1.251	F	1.289	F	**0.038**	1.288	F	**0.037**
	Sepulveda Boulevard	PM	1.477	F	1.503	F	**0.026**	1.499	F	**0.022**
48	National Boulevard and	AM	0.640	B	0.653	B	0.013	0.649	B	0.009
	Westwood Boulevard	PM	0.887	D	0.935	E	**0.048**	0.924	E	**0.037**
49	Santa Monica Freeway WB On-/Off-Ramps/	AM	0.984	E	1.011	F	**0.027**	1.010	F	**0.026**
	National Boulevard and Overland Avenue	PM	1.141	F	1.224	F	**0.083**	1.203	F	**0.062**
54	Venice Boulevard and	AM	1.004	F	1.014	F	**0.010**	1.012	F	0.008
	Sepulveda Boulevard	PM	1.051	F	1.070	F	**0.079**	1.064	F	**0.013**

Bold *text indicates a significant impact.*
Source: Hirsch/Green Transportation Consulting, Inc. 2009 and 2012.

Table L
Revised Development Project
Cumulative-With-Project – Impacted Intersections

Int. #	Intersection	Peak Hour	Significant Impact	
			Proposed Development Project	Revised Development Project
3	Wilshire Boulevard and Westwood Boulevard	AM		
		PM	X	LTS w/M
4	Ohio Avenue and Sepulveda Boulevard	AM		
		PM	X	LTS w/M
6	Santa Monica Boulevard and Sepulveda Boulevard	AM		
		PM	X	X
7	Santa Monica Boulevard and Westwood Boulevard	AM		
		PM	X	
14	Olympic Boulevard and Bundy Drive	AM		
		PM	X	X
15	Olympic Boulevard and Barrington Avenue	AM		
		PM	X	
16	Olympic Boulevard and Sawtelle Boulevard	AM		
		PM	X	X
17	Olympic Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
18	Olympic Boulevard and Westwood Boulevard	AM		
		PM	X	LTS w/M
21	Tennessee Avenue/San Diego Freeway SB Off-Ramp and Sawtelle Boulevard	AM		
		PM	X	LTS w/M
24	Pico Boulevard and Santa Monica EB Off-Ramp/ 34th Street	AM		
		PM	X	X
25	Pico Boulevard and Centinela Avenue	AM	X	
		PM	X	X
26	Pico Boulevard and Bundy Drive	AM		
		PM	X	X
27	Pico Boulevard and Barrington Avenue	AM	X	LTS w/M
		PM		
28	Pico Boulevard and Gateway Boulevard	AM		
		PM	X	X
29	Pico Boulevard and Sawtelle Boulevard	AM	X	X
		PM	X	X
30	Pico Boulevard and Cotner Avenue	AM		
		PM	X	X
31	Pico Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
33	Pico Boulevard and Westwood Boulevard	AM		
		PM	X	X
34	Pico Boulevard and Overland Avenue	AM		
		PM	X	LTS w/M
38	Pico Boulevard and Motor Avenue/Fox Studios Driveway	AM		
		PM	X	X

Table L
Revised Development Project
Cumulative-With-Project – Impacted Intersections

Int. #	Intersection	Peak Hour	Significant Impact	
			Proposed Development Project	Revised Development Project
40	Exposition Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
44	National Boulevard and Sawtelle Boulevard	AM		
		PM	X	X
47	National Boulevard and Sepulveda Boulevard	AM	X	X
		PM	X	X
48	National Boulevard and Westwood Boulevard	AM		
		PM	X	X
49	Santa Monica Freeway WB On-/Off-Ramps/National Boulevard and Overland Avenue	AM	X	X
		PM	X	X
54	Venice Boulevard and Sepulveda Boulevard	AM	X	
		PM	X	LTS w/M

Source: Hirsch/Green Transportation Consulting, Inc., February 2010 and December 2012.

Neighborhood Intrusion

As discussed in Section IV.N (Traffic/Transportation) of the Draft EIR, the Development Project's conservative potential new traffic additions to Richland Avenue or other local/residential streets in the nearby vicinity would be less than the minimum 120 vehicles per day identified in the West Los Angeles Traffic Improvement Management Plan (WLA TIMP) and LADOT's Traffic Study Policies and Procedures memorandum. Therefore, Development Project impacts related to neighborhood intrusion were found to be less than significant.

As discussed previously, the Revised Development Project would generate fewer daily and peak-hour traffic trips. As such, the Revised Development Project also would not contribute more than 120 vehicle trips to the local residential streets. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Access

As discussed in Section IV.N (Traffic/Transportation) of the Draft EIR, the Development Project would not result in any significant impacts related to access. Because access under the Revised Development Project is substantially the same as for the Development Project described in the Draft EIR, no significant impacts related to access associated with the Revised Development Project would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the

severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Parking

As discussed in Section IV.N (Traffic Transportation) of the Draft EIR, the Development Project would meet the LAMC requirements for parking, and no significant impacts related to parking were identified. The Revised Development Project also would provide parking in compliance with LAMC requirements, and no significant impacts related to parking associated with the Revised Development Project would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Transit

As discussed in Section IV.N (Traffic Transportation) of the Draft EIR, the Development Project would generate a transit ridership of approximately 430 persons per day, including about 32 persons (6 inbound to the Development Project, 26 outbound) during the AM peak hour, and about 31 persons (20 inbound, 11 outbound) during the PM peak hour. Based on the current bus service schedules, approximately 40 buses per hour serve the site during both the morning and afternoon peak periods. As such, Development Project additions to bus ridership would be an average of about 10 persons per bus per day, with an average of less than one new rider per bus during the peak hours. This level of new rider demand would not result in any significant transit-related impacts to the existing level of bus service in the area.

The Revised Development Project would result in additional transit ridership, especially as a result of the proposed transit-oriented-development/transportation-demand-management (TOD/TDM) trip reduction and traffic mitigation programs. As described in detail in the Traffic Study included in Attachment C, these programs would reduce the number of vehicle trips generated by the project by approximately 1,312 trips per day, including about 63 trips during the AM peak hour and 121 trips during the PM peak hour. Using the average vehicle occupancy factor of 1.2 persons per vehicle, this would translate to approximately 1,574 new transit riders per day, including approximately 75 new transit riders (25 inbound to the site and 50 outbound from the site) during the AM peak hour and approximately 145 new transit riders (80 inbound and 65 outbound) during the PM peak hour. However, the project site is currently served by a total of approximately 40 buses per hour, while the future Expo Line facility is expected to provide up to 12 trains per hour per direction (total of 24 trains per hour) during the morning and afternoon/evening peak commute periods. As such, the potential project utilization of these services is expected to increase ridership by an average of only about two or three new riders per bus or train during the morning and afternoon/evening peak commute periods. This level of new rider demand would not result in any significant transit-related impacts to the existing level of bus service in the area. Additionally, the future Expo Line Sepulveda/Exposition Station could result in increased bus service to the project site, as Metro and other transit providers provide additional buses and/or add new routes to

accommodate the new Expo Line riders. If this occurs, the potential transit ridership impacts described above would be even further reduced. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

In-Street Construction

As discussed in Section IV.N (Traffic/Transportation) of the Draft EIR, construction of the Development Project would not require any street closures or closure of two or more lanes. Partial lane closures could occur, but these would be conducted in accordance with LADOT's traffic management plan requirements. Additionally, staging of construction equipment would occur within designated areas only and would not impede traffic. Also, all construction workers would be required to park either at the Development Project site or at a designated parking lot. Further, although sidewalks around the Development Project site would be closed off to regular pedestrian traffic, caution tape and orange cones/fencing would be placed around the sidewalk areas to discourage and prevent pedestrians from using the sidewalk areas within the construction zone. Signage would be posted around the perimeter of the site to direct pedestrians to alternate safe routes via established crosswalks and sidewalks. Access to surrounding properties/businesses would not be impeded by Development Project construction. Construction of the Development Project would not require rerouting of any bus routes or closures of any bus stops. For these reasons, Development Project impacts related to in-street construction were found to be less than significant.

The construction activities associated with the Revised Development Project would be much the same as would occur under the Development Project Described in the Draft EIR. For these reasons, the less than significant in-street construction impacts identified for the Development Project in the Draft EIR would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Utilities

Water

Water Treatment

As discussed in Section IV.O (Utilities – Water) of the Draft EIR, the Los Angeles Aqueduct Filtration Plant (LAAFPP) has a remaining treatment capacity of approximately 150 million gallons per day in non-summer months and 50 millions gallons per day during summer months. For purposes of a conservative analysis, it is assumed that the LAAFP only has 50 million gallons of remaining capacity. The Draft EIR concluded that the water consumption associated with the Development Project would represent approximately 0.1 percent of the remaining treatment capacity at the LAAFP, and no significant impacts related to water treatment would occur.

As shown on Table M, the Revised Development Project would consume approximately 64,623 gallons of water per day, approximately 4,180 gallons of water per day more than the water consumption associated with the Development Project. The water treatment requirements associated with the Revised Development Project also would represent approximately 0.1 percent of the remaining treatment capacity at the LAAFP. Thus, no significant impacts related to water treatment were identified for the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Water Supply

As discussed in Section IV.O (Utilities – Water) of the Draft EIR, a water supply assessment (WSA) was prepared by LADWP for the Development Project. The WSA estimated that the Development Project would consume approximately a net increase of 60,443 gallons of water per day (68.62 acre-feet per year). The Draft EIR concluded that with implementation of the City's standard water conservation measures, the Development Project would not result in any significant impacts related to water supply.

As shown on Table M, the Revised Development Project would consume 64,623 gallons of water per day (72.39 acre-feet per year), 4,180 gallons per day (3.77 acre-feet per year) more than the Development Project described in the Draft EIR. Although the Revised Development Project would consume more water, the amount of water supply needed for the Revised Development Project would fall well within the long-term projected water demand identified within LADWP's 2010 Urban Water Management Plan for LADWP's service area (i.e., 2015: 614,794 acre-feet/year; 2020: 652,012 acre-feet/year; 2025: 675,604 acre-feet/year; 2030: 701,164 acre-feet/year; and 2035: 710,760 acre-feet per year). Additionally, the Revised Development Project would be required to comply with the same standard water-conservation measures identified in the Draft EIR. Thus, impacts related to water supply under the Revised Development Project would be less than significant, similar to the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Wastewater

Wastewater Infrastructure

As discussed in Section IV.O (Utilities – Wastewater) of the Draft EIR, the Development Project would generate approximately 88,638 gallons of wastewater per day. The Draft EIR concluded that with implementation of Mitigation Measure O-12 (conducting detailed gauging and potential sewer line replacement/upgrade) would ensure that the Development Project would not result in any significant impacts related to sewer infrastructure.

Table M
Revised Development Project Water Consumption

Land Use	Size	Consumption Rate[a]	Base Demand (gallons/day)	Water Efficiency Requirements Ordinance Savings (gallons/day)*	Total (gallons/day)
Residential Component					
Studio	68 units	80 gallons/unit/day	5,440	544	4,896
1-Br Residential	274 units	120 gallons/unit/day	32,880	3,288	29,592
2-Br Residential	275 units	160 gallons/unit/day	44,000	6,600	37,400
3-Br Residential	21 units	200 gallons/unit/day	4,200	630	3,570
Health Club	6,000 sf	0.80 gallons/sf/day	4,800	158	4,642
Lobby/Lounge	9,700 sf	0.08 gallons/sf/day	776	N/A	776
Swimming Pool and Spa	3,413 sf	0.20 gallons/sf/day	672	N/A	672
Water Fountains/Features	2,665 sf	0.16 gallons/sf/day	415	N/A	415
Residential Component Total			***78,543***	***9,144***	***81,963***
Commercial and Landscaping Component					
Retail	160,000 sf	0.08 gallons/sf/day	12,800	256	12,544
Landscaping[b]	68,900 sf	N/A	N/A	N/A	4,898
Commercial Component Subtotal					***17,442***
Revised Development Project Subtotal					**99,405**
Less Existing Uses Total					***24,288***
Less Additional Conservation[c]					***10,494***
Net Increase in Water Consumption (Revised Development Project)					**64,623**
Net Increase in Water Consumption (Proposed Development Project)					**60,443**

Note: Numbers may not add up exactly due to rounding during calculations.
[a] *Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table.*
[b] *Landscaping water use is estimated by Landscape Water Management Program v1.4 developed by Irrigation Training and Research Center of California Polytechnic State University, San Luis Obispo.*
[c] *Water conservation due to additional conservation commitments agreed to by the developer, Casden Properties LLC (see Table II in Appendix IV.O-1 of the Draft EIR).*
**Source: Water Supply Assessment for the Casden Sepulveda Project, prepared by Water Resources Division, May 18, 2010.*

As shown on Table N, the Revised Development Project would generate 94,734 gallons of wastewater per day, 6,096 gallons per day more than the Development Project described in the Draft EIR. Although the Revised Development Project would generate more wastewater, regardless of the type of development that were to occur at the Development Project site (including the Revised Development Project), detailed gauging of the local sewer line and potential replacement/upgrade to serve the development would be

required. Thus, Mitigation Measure O-23 also would apply to the Revised Development Project, and impacts would be less than significant. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table N
Revised Development Project Wastewater Generation

Land Use	Size	Generation Rate	Total (gallons/day)
Studio Residential	68 units	80 gallons/unit/day	5,440
1-Br Residential	274 units	120 gallons/unit/day	32,880
2-Br Residential	275 units	160 gallons/unit/day	44,000
3-Br Residential	21 units	200 gallons/unit/day	4,200
Retail/Commercial	160,000 sf	80 gallons/day/1000 sf	12,800
		Subtotal	**99,320**
		Less Existing Uses Total	***4,586***
Net Increase in Wastewater Generation (Revised Development Project)			**94,734**
Net Increase in Wastewater Generation (Proposed Development Project)			**88,638**

Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.

Wastewater Treatment

As discussed in Section IV.O (Utilities – Wastewater) of the Draft EIR, the Hyperion Treatment Plant (HTP) has a remaining treatment capacity of approximately 88 million gpd. The Draft EIR concluded that the Development Project would represent approximately 0.1 percent of the remaining capacity at HTP, and no significant impacts related to wastewater treatment were identified for the Development Project.

As shown on Table N, the Revised Development Project would generate 94,734 gallons of wastewater per day, 6,096 gallons per day more than the Development Project described in the Draft EIR. The wastewater generation associated with the Revised Development Project also would represent approximately 0.1 percent of the remaining treatment capacity of the HTP. Thus, no significant impacts related to wastewater treatment would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Solid Waste

Construction

As discussed in Section IV.O (Utilities – Solid Waste) of the Draft EIR, the Development Project would generate 4,316 tons of debris over the entire duration of the construction phase. The landfills that would serve the Development Project have a maximum daily intake of 9,947 tons and roughly 87,000,000 tons of overall remaining capacity. Conservatively assuming that none of the construction debris would be

recycled, these facilities would have adequate capacity to accommodate the Development Project's demolition and construction debris over the duration of the entire construction phase. Additionally, through compliance with AB 939 requiring that at least 50 percent of the construction and demolition waste be recycled/reused, the recycling of most of the solid waste generated by the construction and demolition phases of the Development Project would have a short-term impact to landfills and solid waste services. Therefore, the Development Project's construction related impacts to solid waste were found to be less than significant.

As shown on Table O, the Revised Development Project would generate approximately 4,131 tons of debris over the entire duration of the construction phase, approximately 185 tons less than the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table O
Approximate Revised Development Project Demolition and Construction Waste Generation

Land Use	Size	Generation Rate[1]	Generation (tons)
Demolition			
Nonresidential	30,576 sf	173 lbs/sf	2,644
Construction			
Residential	531,992 sf	4.38 lbs/sf	1,165
Nonresidential	160,000 sf	4.02 lbs/sf	322
		Total Construction Generation	***1,487***
		Total Revised Development Project Generation	**4,131**
		Total Proposed Development Project Generation	**4,316**

lbs = pounds *sf = square feet*

[1] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, page A-1.*

Operation

As discussed in Section IV.O (Utilities – Solid Waste) of the Draft EIR, the landfills that would serve the Development Project would have a remaining available daily intake of 6,151 tons per day. The Development Project would generate approximately 3,272 pounds of solid waste per day over existing uses, representing approximately 0.02 percent of the remaining combined daily intake capacity at the landfills. Furthermore, operations within the City and the Development Project site would continue to be subject to the requirements set forth in AB 939 requiring each city or county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The increase in solid waste generated by the Development Project would not result in the need for additional waste collection routes and recycling or disposal facilities. Therefore, impacts associated with solid waste service were found to be less than significant for the Development Project.

As shown on Table P, the Revised Development Project would generate approximately 3,138 pounds of solid waste per day, approximately 134 pounds per day less than the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table P
Revised Development Project Solid Waste Generation

Land Use	Size	Generation Rate	Total (pounds/day)
Residential Units	638 units	4.0 pounds/unit/day	2,552
Commercial/Retail	160,000 sf	0.005 pounds/sf/day	800
		Subtotal	**3,352**
		Less Existing Uses Total	***214***
Net Increase in Solid Waste Generation (Revised Development Project)			**3,138**
Net Increase in Solid Waste Generation (Proposed Development Project)			**3,272**
Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.			

Electricity

As discussed in Section IV.O (Utilities – Electricity) of the Draft EIR, the Development Project would consume approximately 17,112 KW-Hours of electricity per day. Based on information presented in the Integrated Resource Plan (IRP), LADWP anticipates it can supply sufficient energy to its service area through the year 2027. In addition, LADWP, being part of the western United States power grid, is required to meet certain operational, supply, and reliability criteria as established by the WECC and the NERC. These criteria establish, for one, certain reserve margin requirements that LADWP must meet to accommodate any unforeseen contingencies. Furthermore, energy conservation standards established by Title 24 of the California Code of Regulations would be incorporated into new buildings as part of the building permit process and thus, reduce the amount of electricity consumed by the Development Project by addressing insulation, glazing, lighting, shading, and water and space heating systems. The Applicant of the Development Project would be required to incorporate the energy conservation measures identified in the City's Standard Mitigation Measures (refer to Mitigation Measures O-18 through O-40) into the Project design. Additionally, if it is determined that the existing distribution infrastructure is inadequate to deliver the Development Project's estimated electricity consumption, the Applicant of the Development Project shall make arrangements with LADWP to upgrade facilities and be financially responsible for those upgrades (see Mitigation Measure O-40). As such, impacts to electricity supplies were found to be less than significant for the Development Project.

As shown on Table Q, the Revised Development Project would consume approximately 14,690 KW-Hours of electricity per day, approximately 2,422 KW-Hours of electricity per day less than the Development Project described in the Draft EIR. Additionally, the Revised Development Project would be required to implement Mitigation Measures O-18 through O-40 identified for the Development Project

described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table Q
Revised Development Project Electricity Consumption

Land Use	Size	Consumption Rate	Total (KW-Hours/day)
Residential Units	638 units	(5,626.5 KW-Hours/unit/yr) ÷ (365 days/yr)	9,835
Commercial/Retail	160,000 sf	(13.55 KW-Hours/sf/yr) ÷ (365 days/yr)	5,940
		Subtotal	**15,775**
		Less Existing Uses Total	***1,085***
		Net Increase in Electricity Consumption (Revised Development Project)	**14,690**
		Net Increase in Electricity Consumption (Proposed Development Project)	**17,112**
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

Natural Gas

As discussed in Section IV.O (Utilities – Natural Gas) of the Draft EIR, the Development Project would consume approximately 96,573 cubic feet of natural gas per day. According to the California Gas Report 2010, natural gas supplies from the southwestern United States (i.e., the San Juan Basin and the Permian Basin) are expected to meet southern California's gas demand. Furthermore, Title 24 of the California Code of Regulations establishes energy conservation standards for new construction. These energy conservation standards address insulation, glazing, lighting, shading, and water and space heating systems. The Applicant of the Development Project would be required to and intends to incorporate the energy conservation measures identified in the City's Standard Mitigation Measures (refer to Mitigation Measures O-18 through O-40) into the Project design. With modern energy efficient construction materials, the Development Project would be consistent with the City's energy conservation standards also helping to reduce demand for natural gas. Additionally, according to the California Gas Report 2010, Southern California Gas (SCG) operates in an environment where interstate pipeline capacity exists in excess of anticipated demand. Therefore, there is adequate pipeline capacity to deliver natural gas to the City. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. However, should it be determined that inadequate capacity exists to service the Development Project site, the Applicant of the Development Project shall be required to fund the necessary distribution system upgrades (see Mitigation Measure O-41). Impacts to the distribution infrastructure would be addressed through this process. Therefore, impacts related to natural gas were found to be less than significant for the Development Project.

As shown on Table R, the Revised Development Project would consume approximately 99,263 cubic feet of natural gas per day, approximately 2,690 cubic feet per day more of natural gas than the Development Project described in the Draft EIR. Although the Revised Development Project would consume more

natural gas, the amount of natural gas associated with the Revised Development Project would fall within the project demand for the state. Additionally, the Revised Development Project would be required to comply with Title 24 requirements and the energy conservation measures identified in the EIR (Mitigation Measures O-18 through O-40); no significant impacts related to natural gas would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Table R
Development Project Natural Gas Consumption

Land Use	Size	Consumption Rate	Total (cf/day)
Residential Units	638 units	133.7 cf/unit/day	85,301
Retail/Commercial	160,000 sf	0.1 cf/sf/day	16,000
		Subtotal	**101,301**
		Less Existing Uses Total	***2,038***
Net Increase in Natural Gas Consumption (Revised Development Project)			**99,263**
Net Increase in Natural Gas Consumption (Proposed Development Project)			**96,573**
Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.			

SECTION V (GENERAL IMPACT CATEGORIES)

Summary of Significant Unavoidable Impacts

As discussed in Section V (General Impact Categories – Summary of Significant Unavoidable Impacts), based on the analysis contained in Section IV of the Draft EIR for the Development Project, implementation of the Development Project would result in significant unavoidable environmental impacts related to Air Quality (Construction NO_x and ROG and Operational ROG, NO_x, and CO); Land Use and Planning (Policy Consistency); Noise (Construction and Operation); and Transportation/Traffic (Intersection LOS).

As discussed in the additional analysis prepared for the Revised Development Project, above, the Revised Development Project also would result in significant unavoidable environmental impacts related to these same environmental issues. The Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Growth Inducing Impacts

As discussed in Section V (General Impact Categories – Growth Inducing Impacts), the housing, population, and employment associated with the Development Project would be consistent with projected growth for the West Los Angeles Community Plan area and City of Los Angeles. Additionally, roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.)

associated with the Development Project would not induce growth because they would only serve the Development Project.

As discussed above (refer to subheading "Population, Housing, and Employment"), the housing, population, and employment associated with the Revised Development Project also would be consistent with projected growth for the West Los Angeles Community Plan area and City of Los Angeles. Additionally, roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) associated with the Revised Development Project would not induce growth because they would only serve the Revised Development Project. Thus, the Revised Development Project would not induce substantial unplanned growth, similar to the Development Project described in the Draft EIR. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Significant Irreversible Environmental Changes

Use of Non-renewable Resources

As discussed previously, the Development Project site is currently developed and is located in an urbanized area of the City. Implementation of the Development Project would represent a continued long-term commitment to use of the site. The Development Project would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. However, the Development Project would not require a large commitment of any of these resources, and impacts related to this issue were found to be less than significant.

The Revised Development Project development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. The square footage associated with the Revised Development Project (791,431 square feet) is substantially similar to the square footage associated with the Development Project described in the Draft EIR (785,564 square feet). Similar to the Development Project described in the Draft EIR, the Revised Development Project would represent a continued long-term commitment to use of the site and would involve an irreversible commitment to the use of non-renewable resources during the construction and operation phases in the form of refined petroleum-based fuels, natural gas for space and water heating, and mineral resources used in construction materials. However, the Development Project would not require a large commitment of any of these resources, and impacts related to this issue would be less than significant. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Secondary Impacts

As discussed previously, the Development Project includes development of a mixed-use development in an urbanized area that is already served by an existing roadway system and utility infrastructure. Implementation of the Development Project does not include infrastructure improvements that would commit future generations to using the Development Project site for the proposed land uses, and no significant impacts related to this issue would occur.

The Revised Development Project development of the same site with the same types of land uses (i.e., residential land uses in four structures over commercial land uses and subterranean parking) identified for the Development Project in the Draft EIR. The Development Project also would not include infrastructure improvements that would commit future generations to using the Development Project site for the proposed land uses, and no significant impacts related to this issue would occur. Therefore, the Revised Development Project would not result in any new significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

Irreversible Damage

As discussed previously, with the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in a retail/commercial setting, the Development Project would not involve the routine use, transport, or disposal of hazardous materials. Also, as discussed in Section IV.G (Hazards and Hazardous Materials), during construction the Development Project Applicant would follow all applicable requirements to ensure safe use, storage and disposal of any hazardous materials or wastes that could be used. Additionally, the Project Applicant would be required to implement Mitigation Measures G-1 through G-7 related to the potential presence of USTs, PCBs, ACMs, LBP, and possible soil contamination. No significant environmental (contamination) issues would occur at the site, and no further investigations relative to the environmental conditions on the site are needed. Therefore, the Development Project would not result in irreversible damage that could result from environmental accidents, and impacts related to this issue were found to be less than significant.

Similar to the Development Project described in the Draft EIR, the Revised Development Project would not involve the routine use, transport, or disposal of hazardous materials. Further, the hazards and hazardous materials conditions described for the Development Project site in the Draft EIR apply to the Revised Development Project, and the Revised Development Project would be subject to the requirements of Mitigation Measures G-1 through G-7, which would ensure that no significant impacts related to hazards and hazardous materials would occur. No significant environmental (contamination) issues would occur at the site, and no further investigations relative to the environmental conditions on the site are needed. Thus, no significant impacts related to this issue would occur under the Revised Development Project. Therefore, the Revised Development Project would not result in any new

significant impacts and would not increase the severity of the significant impacts associated with this issue identified for the Development Project described in the Draft EIR.

SECTION VI (ALTERNATIVES TO THE PROPOSED PROJECT)

The Revised Development Project would have the same Project Objectives as the Development Project described in the Draft EIR. Also, Alternative C described in the Draft EIR would continue to be the environmentally superior alternative, due to its ability to substantially reduce/avoid the significant impacts of the Revised Development Project (refer to Table S).

Table S
Alternatives Comparison – Revised Development Project

Impact Area	Revised Development Project Impacts w/Mitigation	Alternative A: No Project (Continuation of Existing Uses)	Alternative B: No Project (Zoning Compliant Industrial Development)	Alternative C: Mixed-Use (Office and Industrial Development)	Alternative D: Retail Only Development	Alternative E: Residential Only Development	Alternative Reduced Commerc Developm
Aesthetics	Less Than Significant	Greater	Less	Less	Similar	Similar	Similar
Air Quality							
Construction	Significant and Unavoidable	Less	Similar	Similar	Similar	Similar	Similar
Operation	Significant and Unavoidable	Less	Less	Less	Similar	Similar	Similar
Cultural Resources							
Historic Resources	Less Than Significant	Similar	Similar	Similar	Similar	Similar	Similar
Paleontological Resources	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Archaeological Resources	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Geology and Soils	Less Than Significant	Greater	Similar	Similar	Similar	Similar	Similar
Greenhouse Gas Emissions	Less Than Significant	Less	Less	Less	Less	Less	Less
Hazards and Hazardous Materials							
Storage Tanks	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
ACMs	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
LBP	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
PCBs	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Contaminated Soils	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Hydrology and Water Quality							
Surface Water Hydrology							
Tsunamis, Seiches, and	Less Than Significant	Greater	Similar	Similar	Similar	Similar	Similar
Flooding	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Groundwater	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Water Quality							
Construction	Less Than Significant	N/A	Similar	Similar	Similar	Similar	Similar
Operation	Less Than Significant	Greater	Similar	Similar	Similar	Similar	Similar
Land Use and Planning	Significant and Unavoidable	Less	Less	Less	Similar	Similar	Similar
Mineral Resources	Less Than Significant	Similar	Similar	Similar	Similar	Similar	Similar

Table S
Alternatives Comparison – Revised Development Project

Impact Area	Revised Development Project Impacts w/Mitigation	Alternative A: No Project (Continuation of Existing Uses)	Alternative B: No Project (Zoning Compliant Industrial Development)	Alternative C: Mixed-Use (Office and Industrial Development)	Alternative D: Retail Only Development	Alternative E: Residential Only Development	Alternative Reduced Commerc Developm
Noise							
Construction Impacts							
Vibration	Significant and Unavoidable	Less	Less	Less	Similar	Similar	Similar
Cumulative	Significant and Unavoidable	Less	Similar	Similar	Similar	Similar	Similar
Operational Impacts	Significant and Unavoidable	Less	Less	Less	Similar	Similar	Similar
Population, Housing, and Employment							
Population	Less Than Significant	Less	Less	Less	Less	Similar	Similar
Housing	Less Than Significant	Less	Less	Less	Less	Similar	Similar
Employment	Less Than Significant	Less	Similar	Similar	Similar	Less	Similar
Public Services							
Fire Protection	Less Than Significant	Less	Similar	Similar	Similar		
Police Protection	Less Than Significant	Less	Similar	Similar	Similar	Similar	Similar
Schools	Less Than Significant	Less	Less	Less	Less	Similar	Similar
Parks and Recreation	Less Than Significant	Less	Less	Less	Less	Similar	Similar
Libraries	Less Than Significant	Less	Less	Less	Less	Similar	Similar
Transportation/Traffic							
Traffic	Significant and Unavoidable	Less	Less	Less	Less	Less	Less
Parking	Less Than Significant	N/A	Similar	Similar	Similar	Similar	Similar
Utilities							
Water Supply	Less Than Significant	Less	Less	Less	Less	Less	Less
Wastewater	Less Than Significant	Less	Less	Less	Less	Less	Less
Solid Waste	Less Than Significant	Less	Less	Less	Less	Less	Less
Electricity	Less Than Significant	Less	Less	Less	Less	Less	Less
Natural Gas	Less Than Significant	Less	Less	Less	Less	Less	Less

This page left blank intentionally.